



July 19, 2021

Edward Chu  
Acting Regional Administrator  
U.S. EPA Region 7  
11201 Renner Blvd.  
Lenexa, KS 66219

Re: Nebraska 2021 Ambient Air Monitoring Network Plan and 5-Year Assessment

Dear Mr. Chu,

Enclosed is the *Nebraska 2021 Ambient Air Monitoring Network Plan* (2021 Network Plan). This document is submitted pursuant to the requirements set forth in 40 CFR Part 58.10.

The 2020 Network Plan seeks approval for upcoming modifications to the Nebraska Air Monitoring Network:

- 1) Relocation of the south Omaha ozone and PM<sub>10</sub> monitoring site at the request of the property owner;
- 2) Installation of a new PM<sub>2.5</sub> monitoring site at Homestead National Historical Park near Beatrice, Nebraska;
- 3) Replacement of a sequential filter-based PM<sub>2.5</sub> monitor with a continuous monitor in Blair, Nebraska.

The 2021 Network Plan was made available to the public on the NDEE website on May 7, 2021. The public comment period ended June 7, 2021. No comments were received as of that date.

Please direct questions or inquiries concerning the 2021 Network Plan to David Adams at 402-471-4159 ([david.adams@nebraska.gov](mailto:david.adams@nebraska.gov)) or Randy Smith at 402-471-4272 ([randy.smith@nebraska.gov](mailto:randy.smith@nebraska.gov)).

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Buell".

Tom Buell  
Monitoring and Remediation Division Administrator

Enclosure:

Nebraska 2021 Ambient Air Monitoring Network Plan

E-copies with enclosures to:

Will Stone, U.S. EPA Region 7; Russ Hadan, DCHD; Gary R. Bergstrom and Jim Fobben, LLCHD



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## Draft 2021 Ambient Air Quality Monitoring Network Plan

This information is provided by the Nebraska Department of Environment and Energy to assist the public and regulated community.

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Nebraska's Draft 2021 Ambient Air Quality Monitoring Network Plan was prepared to meet the federal requirements set forth in 40 CFR Part 58.10. It describes the current ambient air quality monitoring network in Nebraska and planned and possible changes through 2021.

Written comments regarding this Draft Network Plan may be submitted to the Nebraska Department of Environment and Energy (NDEE) at the mail or e-mail addresses below. Comments should be submitted by June 18, 2021. Comments will be addressed as appropriate in the Final Network Plan.

Mail:  
 Nebraska Department of Environment and Energy  
 Attn: David Adams - Air Quality Compliance Section  
 PO Box 98922  
 Lincoln, NE 68509

Email: [NDEE.airquality@nebraska.gov](mailto:NDEE.airquality@nebraska.gov)

# Nebraska Department of Environment and Energy

## Nebraska 2021 Ambient Air Monitoring Network Plan

For the period July 1, 2021 through June 30, 2022

NDEE Document #21-008



**Jim Macy, Director**

**May 10, 2021**

This document fulfills the requirements of 40 CFR Part 58.10 for an annual plan for the ambient air quality monitoring conducted by the Nebraska Department of Environment and Energy, the Lincoln-Lancaster County Health Department, and the Douglas County Health Department.

# Nebraska 2021 Ambient Air Monitoring Network Plan

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# Nebraska 2021 Ambient Air Monitoring Network Plan

## Acronyms, Abbreviations, and Definitions

### Agencies/Organizations

- DCHD - Douglas County Health Department
- EPA - United States Environmental Protection Agency
- EPA R7 - United States Environmental Protection Agency Region VII
- LLCHD - Lincoln/Lancaster County Health Department
- NDEE - Nebraska Department of Environment and Energy

### Regulations

- CFR - Code of Federal Regulations
- DRR - Data Requirements Rule or 40 CFR Part 51 Subpart BB - Data Requirements for Characterizing Air Quality for the Primary SO<sub>2</sub> NAAQS
- NAAQS - National Ambient Air Quality Standards
- Title 129 - Nebraska Air Quality Regulations

### Site Types

- IMPROVE - Interagency Monitoring of Protected Visual Environments (monitoring performed to evaluate regional haze)
- MDN - Mercury Deposition Network (a type of NADP site)
- NADP - National Atmospheric Deposition Program (analysis of deposition components in precipitation. May include NTN and MDN sites)
- NCore - National Core multi-pollutant monitoring stations. Monitors at these sites are required to measure particles (PM<sub>2.5</sub>, speciated PM<sub>2.5</sub>, PM<sub>10-2.5</sub>), O<sub>3</sub>, SO<sub>2</sub>, CO, nitrogen oxides (NO/NO<sub>y</sub>), Pb, and basic meteorology.
- NTN - National Trends Network (a type of NADP site that analyzes for acidity, sulfate, nitrate, ammonium, chloride, and base cations (e.g., CA, Mg, K and Na))
- SLAMS - State and Local Air Monitoring Stations

### Monitor Terminology

- AirNow - EPA web application that reports current local air quality conditions (airnow.gov).
- AQS - Air Quality System, the name for EPA's air monitoring data base
- FRM - Federal Reference Method used for determining compliance with the NAAQS
- FEM - Federal Equivalent Method used for determining compliance with the NAAQS
- PWEI - Population Weighted Emissions Index (a term defined in 40 CFR Part 58 Appendix D that relates to SO<sub>2</sub> monitoring requirements)

2020 Network Plan - Nebraska's *2020 Ambient Air Monitoring Network Plan & 5-Year Assessment*

2021 Network Plan – Nebraska's *2021 Ambient Air Monitoring Network Plan (i.e., this document)*

### Concentration Units

- ppb - Parts per billion (a volume/volume concentration unit)
- ppm - Parts per million (a volume/volume concentration unit)
- mg/m<sup>3</sup> - Milligrams per cubic meter (a mass/volume concentration unit)
- µg/m<sup>3</sup> - Micrograms per cubic meter (a mass/volume concentration unit)

## Nebraska 2021 Ambient Air Monitoring Network Plan

### Acronyms, Abbreviations, and Definitions (continued)

#### Pollutants

CO	-	Carbon Monoxide
NO	-	Nitric Oxide
NO <sub>2</sub>	-	Nitrogen Dioxide
NO <sub>y</sub>	-	Total reactive oxides of nitrogen. The parameter NO <sub>y</sub> – NO measured at NCore sites approximates the concentration of NO <sub>2</sub> but may be higher.
O <sub>3</sub>	-	Ozone
Pb	-	Lead
TSP-Pb	-	Lead sampled using a TSP sampler
PM <sub>2.5</sub>	-	Particulate matter with a diameter equal to or less than 2.5 micrometers or microns (reported as µg/m <sup>3</sup> with air volumes measures at local conditions)
PM <sub>10</sub>	-	Particulate matter with a diameter equal to or less than 10 micrometers or microns (reported as µg/m <sup>3</sup> with air volumes measures at standard conditions (25° C, 1 atm))
PM <sub>10-2.5</sub>	-	The difference between PM <sub>10</sub> and PM <sub>2.5</sub> (Both being calculated at local conditions)
SO <sub>2</sub>	-	Sulfur Dioxide
TSP	-	Total Suspended Particulates

#### Definitions

Criteria Pollutants – The six pollutants for which National Ambient Air Quality Standards (NAAQS) have been established: carbon monoxide, nitrogen dioxide, ozone, sulfur dioxide, particulates and lead.

*in situ* - A Latin phrase meaning *in the place*. As used in this report it refers to the formation of pollutants in the atmosphere. For example, ozone is formed *in situ* from the photochemical reaction of pollutant precursors. Ozone is not emitted directly from sources. PM<sub>2.5</sub> and haze are also formed *in situ*, although they are also emitted by sources. PM<sub>10</sub> and CO, on the other hand, are largely emitted from sources; *in situ* formation being of minimal importance. NO<sub>x</sub> and SO<sub>x</sub> are emitted and then undergo transformations to NO<sub>2</sub> and SO<sub>2</sub>; they also can play a role in the *in situ* formation of ozone and PM<sub>2.5</sub>.

#### Census Terms

Core-Based Statistical Area (CBSA) – a geographic area defined by the Office of Management and Budget containing an urbanized core of at least 10,000 people and adjacent areas that have a high degree of social and economic integration with the core. CBSAs are made up of whole counties or county equivalents.

Metropolitan Statistical Area (MSA) – a CBSA that has at least one urbanized area with population of 50,000 or more.

Micropolitan Statistical Area (MiSA) – a CBSA that has at least one urban cluster with population at least 10,000 but less than 50,000.



# Nebraska 2021 Ambient Air Monitoring Network Plan

## I. Introduction and Purpose

This Nebraska 2021 Ambient Air Monitoring Network Plan (hereafter referred to as the “2021 Network Plan”) was prepared to meet federal requirements set forth in 40 CFR Part 58.10. State air monitoring agencies are required to submit to the U.S. Environmental Protection Agency (EPA) by July 1 each year an ambient air monitoring network plan with the following purposes:

- Describe the current ambient air monitoring network, including the location and purpose of each monitoring site.
- Describe changes made in the network since submission of the previous plan.
- Review whether the ambient air monitoring network meets the requirements set forth in 40 CFR Part 58 Appendices A, C, D, and E.
- Describe planned and possible changes in the ambient air monitoring network in the upcoming year, as best they can be determined at the time the plan is prepared.

## II. Public Participation

Federal regulations require that annual ambient air monitoring network plans must be made available for public inspection and comment for at least 30 days prior to submission to the EPA. The Nebraska Department of Environment and Energy (NDEE) meets this requirement by posting the plan on the NDEE website ([http://deq.ne.gov/Publica.nsf/Pubs\\_Air\\_Amb.xsp](http://deq.ne.gov/Publica.nsf/Pubs_Air_Amb.xsp)). Written comments regarding this 2021 Network Plan may be submitted to the Nebraska Department of Environment and Energy during the 30-day inspection period as provided below:

Mail:

Nebraska Department of Environment and Energy  
Attn: David Adams – Air Quality Compliance Section  
PO Box 98922  
Lincoln, NE 68509-8922

Email:

[NDEE.airquality@nebraska.gov](mailto:NDEE.airquality@nebraska.gov)

The deadline for submittal of written comments can be found on the NDEE website. Informal inquiries may also be directed to David Adams at 402-471-4159. Verbal comments are not necessarily included or addressed as review comments.

## III. Purpose of Ambient Air Quality Monitoring

The Clean Air Act requires EPA to set National Ambient Air Quality Standards (NAAQS) for pollutants that are common in outdoor air, that come from numerous and diverse sources, and are considered harmful to public health and the environment. Standards have been established for six “criteria” air pollutants: carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), ozone (O<sub>3</sub>), lead, and particle pollution, which is subdivided into particulate matter less than 10 microns in diameter (PM<sub>10</sub>), and particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>).

The statute established two types of national standards for each criteria pollutant. Primary standards set limits to protect public health, including the health of sensitive populations such as people with asthma, children, and the elderly. Secondary standards set limits to protect the public welfare and the environment, including protection against damage to animals, crops, vegetation, and to prevent visibility impairment. The current

## Nebraska 2021 Ambient Air Monitoring Network Plan

primary and secondary standards are shown in Table III-1. Units of measure for the standards are parts per million (ppm) by volume, parts per billion (ppb) by volume, and micrograms per cubic meter of air ( $\mu\text{g}/\text{m}^3$ ).

An ambient air monitoring network serves several purposes:

- (1) Provide air pollution data to the public in a timely manner.
- (2) Support compliance with ambient air quality standards and pollution control strategies.
- (3) Support air pollution research studies.

An area that is in compliance with the standard for a criteria pollutant is said to be in attainment. All areas of Nebraska are currently in attainment for each of the NAAQS.

Pollutant		Primary/ Secondary	Averaging Time	Level	Form
Carbon Monoxide (CO)		Primary	8 hours	9 ppm	Not to be exceeded more than once per year
			1 hour	35 ppm	
Lead		Primary and Secondary	Rolling 3-month average	$0.15 \mu\text{g}/\text{m}^3$ <sup>(1)</sup>	Not to be exceeded
Nitrogen Dioxide (NO <sub>2</sub> )		Primary	1 hour	100 ppb	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
		Primary and Secondary	1 year	53 ppb <sup>(2)</sup>	Annual mean
Ozone (O <sub>3</sub> )		Primary and Secondary	8 hours	$0.070 \text{ ppb}$ <sup>(3)</sup>	Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years
Particle Pollution (PM)	PM <sub>2.5</sub>	Primary	1 year	$12.0 \mu\text{g}/\text{m}^3$	Annual mean, averaged over 3 years
		Secondary	1 year	$15.0 \mu\text{g}/\text{m}^3$	Annual mean, averaged over 3 years
		Primary and Secondary	24 hours	$35 \mu\text{g}/\text{m}^3$	98 <sup>th</sup> percentile, averaged over 3 years
	PM <sub>10</sub>	Primary and Secondary	24 hours	$150 \mu\text{g}/\text{m}^3$	Not to be exceeded more than once per year on average over 3 years
Sulfur Dioxide (SO <sub>2</sub> )		Primary	1 hour	75 ppb <sup>(4)</sup>	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
		Secondary	3 hours	0.5 ppm	Not to be exceeded more than once per year

(1) In areas designated nonattainment for the Pb standards prior to the promulgation of the current (2008) standards, and for which implementation plans to attain or maintain the current (2008) standards have not been submitted and approved, the previous standards ( $1.5 \mu\text{g}/\text{m}^3$  as a calendar quarter average) also remain in effect.

(2) The level of the annual NO<sub>2</sub> standard is 0.053 ppm. It is shown here in terms of ppb for the purposes of clearer comparison to the 1-hour standard level.

(3) Final rule signed October 1, 2015, and effective December 28, 2015; retained in December 2020. The previous (2008) O<sub>3</sub> standards additionally remain in effect in some areas. The previous (2008) O<sub>3</sub> standards are not revoked and remain in effect for designated areas.

(4) The previous SO<sub>2</sub> standards (0.14 ppm 24-hour and 0.03 ppm annual) will additionally remain in effect in certain areas: (1) any area for which it is not yet 1 year since the effective date of designation under the current (2010) standards, and (2) any area for which an implementation plan providing for attainment of the current (2010) standard has not been submitted and approved and which is designated nonattainment under the previous SO<sub>2</sub> standards or is not meeting the requirements of a SIP call under the previous SO<sub>2</sub> standards (40 CFR 50.4(3)). A SIP call is an EPA action requiring a state to resubmit all or part of its State Implementation Plan to demonstrate attainment of the required NAAQS.

## Nebraska 2021 Ambient Air Monitoring Network Plan

When an air quality monitor records pollutant levels that exceed the NAAQS limit, that measurement is termed a “NAAQS exceedance”. For most criteria pollutants a single recorded exceedance does not violate the standard; monitor data from the most recent three-year period must be analyzed to make that determination. Federal regulations specify for each pollutant how the 3-year monitor data must be analyzed to calculate a “design value” that is compared to the level of the NAAQS to establish whether or not the measured air quality is in compliance with the standard. The Form column in Table III-1 specifies how the design value is calculated for each criteria pollutant. The most recent design values for Nebraska’s ambient air monitors are presented in Appendix B.

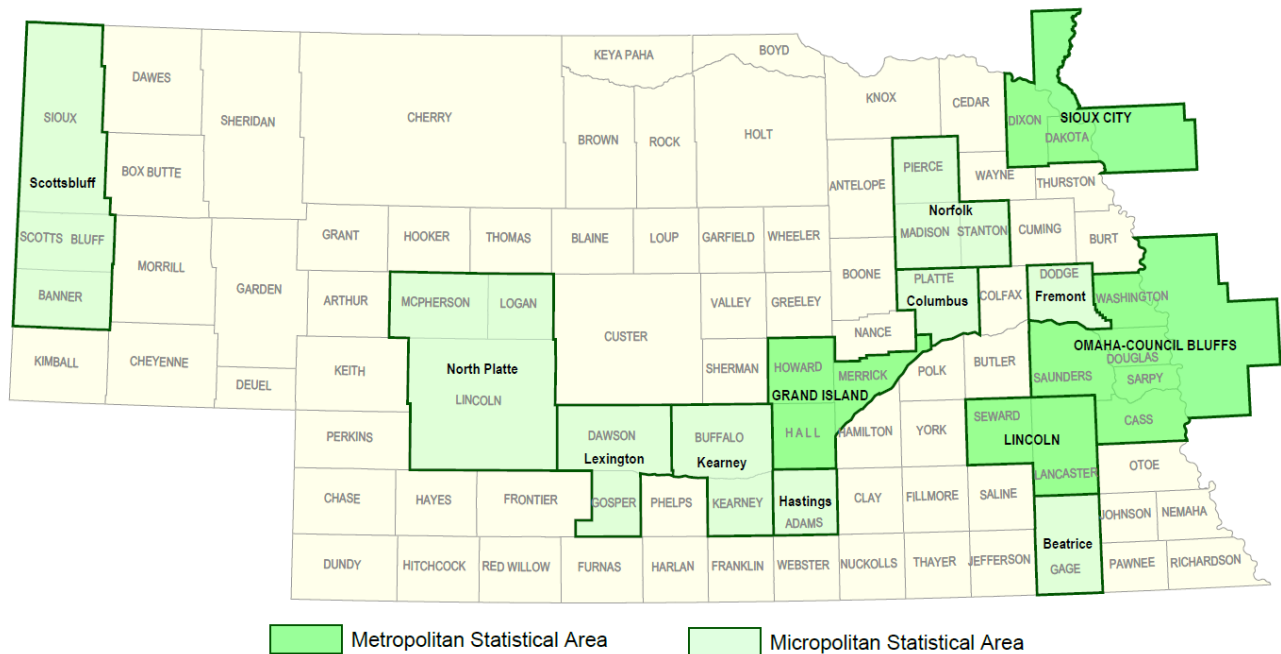
An ambient air monitoring network may include a variety of types of sites to provide information on peak air pollution levels, typical levels of exposure, air pollution levels near significant sources, and pollutant transport. EPA has identified the following general site types:

- Sites located to determine the highest concentrations expected to occur in the area covered by the network.
- Sites located to measure typical concentrations in areas of high population density.
- Sites located to determine the impact of significant sources or source categories.
- Sites located to determine general background levels.
- Sites located to determine the extent of regional pollutant transport among populated areas.
- Sites located to measure air pollution impacts on visibility, vegetation, or other welfare-based impacts.

### IV. Nebraska Metropolitan and Micropolitan Statistical Areas

Discussions in this document of the ambient air monitoring network in Nebraska are organized around the Metropolitan Statistical Areas (MSAs) and Micropolitan Statistical Areas (MiSAs) in which the monitors are located. Nebraska includes all or part of four Metropolitan Statistical Areas along with nine Micropolitan Statistical Areas. Each of these federally-defined urbanized units consists of one or more entire counties. A map of Nebraska’s MSAs and MiSAs is shown in Figure IV-1 below.

**Figure IV-1. Nebraska Metropolitan and Micropolitan Statistical Areas (MSAs and MiSAs) \***



\* Areas as defined by the U.S. Office of Management and Budget, September 2018.

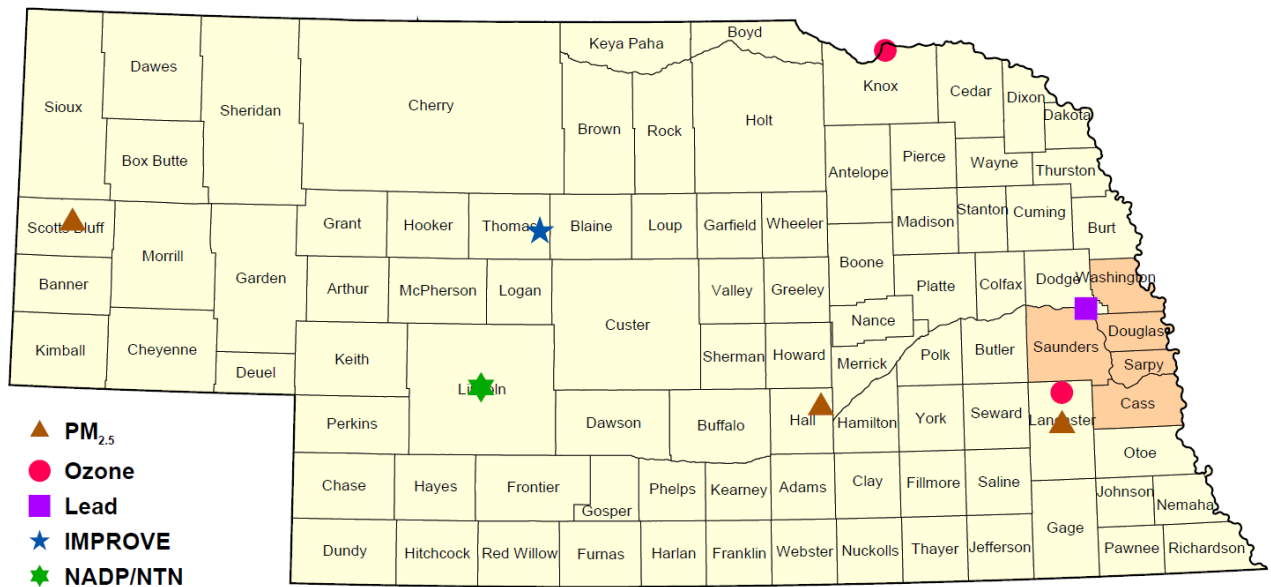
# Nebraska 2021 Ambient Air Monitoring Network Plan

## V. Overview of Current Nebraska Ambient Air Monitoring Network

Nebraska’s current air monitoring network is summarized in Table V-1 below, and monitor locations are shown in Figures V-1 and VI-2 below. The network description tables in Appendix A provide more detailed information on the network, including site locations and monitoring objectives.

Nebraska’s State and Local Air Monitoring Stations (SLAMS) network includes monitoring sites for ozone, carbon monoxide, nitrogen oxides, sulfur dioxide, lead, PM<sub>10</sub>, PM<sub>2.5</sub>, PM<sub>10-2.5</sub> and regional haze (i.e., IMPROVE monitor). The network is operated by the Nebraska Department of Environment and Energy and two local agencies: the Douglas County Health Department (DCHD) and the Lincoln-Lancaster County Health Department (LLCHD).

**Figure V-1. Nebraska Air Quality Monitoring Sites Outside of the Omaha-Council Bluffs Metropolitan Statistical Area, 3/31/2021**



**PM<sub>2.5</sub>**  
 Lincoln (Lancaster County)  
 Grand Island (Hall County)  
 Scottsbluff (Scottsbluff County)

**Ozone**  
 Davey (Lancaster County)  
 Santee (Knox County; operated by EPA)

**Lead**  
 Fremont (Dodge County)

**NADP/NTN**  
 Maxwell (Lincoln County)

**IMPROVE**  
 Nebraska National Forest (Thomas County)

The Nebraska counties in the Omaha-Council Bluffs Metropolitan Statistical Area are indicated by the orange shading.

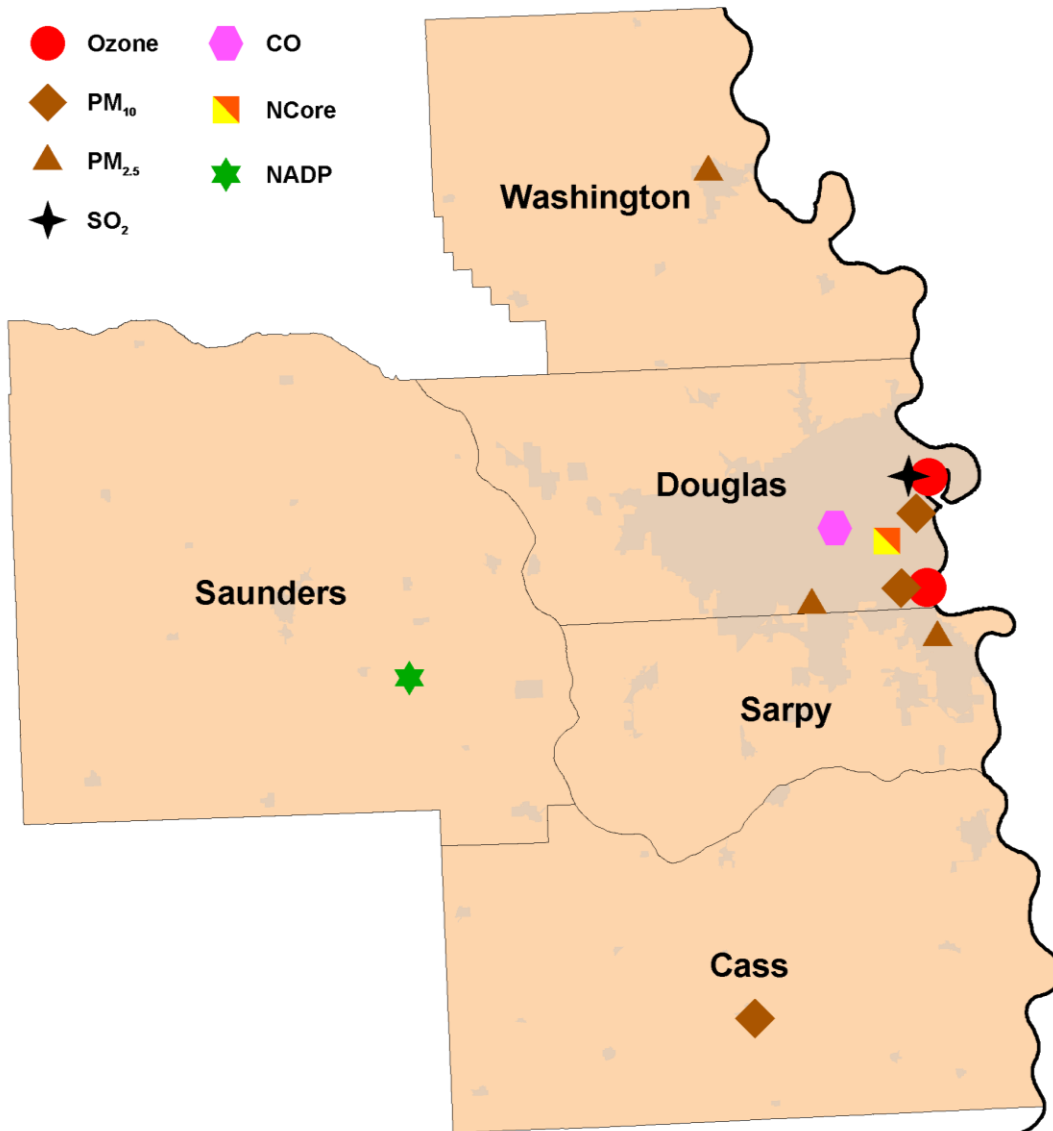
Note: The ozone monitoring site in Knox County is operated by EPA on the Santee Indian Reservation and is not part of NDEE’s SLAMS network. The IMPROVE and NADP/NTN sites are also not part of NDEE’s SLAMS network.

## Nebraska 2021 Ambient Air Monitoring Network Plan

<b>Table V-1. Nebraska Ambient Air Monitoring Network on March 31, 2021. <sup>(1)</sup></b>					
	DCHD Omaha MSA <sup>(2)(3)</sup>	NDEE Cass County <sup>(4)</sup>	LLCHD Lincoln MSA	NDEE Other Areas	Total
SLAMS Sites (includes NCore)	8	1	2	3	14
IMPROVE <sup>(5)</sup>	0	0	0	1	1
NADP <sup>(6)</sup>	1	0	0	1	2
Total Monitoring Sites	9	1	2	5	17
<b>Sites by Pollutant: SLAMS Sites including NCore <sup>(3)</sup></b>					
Ozone	3	0	1	0	4
Carbon Monoxide	2	0	0	0	2
Nitrogen Oxides	1	0	0	0	1
Sulfur Dioxide	2	0	0	0	2
PM <sub>10</sub>	3	1	0	0	4
PM <sub>2.5</sub>	4	0	1	2	7
PM <sub>10-2.5</sub>	1	0	0	0	1
PM <sub>2.5</sub> Speciation	1	0	0	0	1
Lead	0	0	0	1	1
Total Pollutant Sites	17 <sup>(3)</sup>	1	2	3	23
Footnotes:					
<p>(1) This table summarizes the number of operating sites as of 3/31/21 in the NE SLAMS network (including NCore) by operating agency, as well as IMPROVE and NADP sites in Nebraska.</p> <p>(2) The Omaha MSA encompasses 5 NE counties: Cass, Douglas, Sarpy, Saunders, &amp; Washington. DCHD operates sites in Douglas, Sarpy &amp; Washington counties. NDEE operates a site in Cass County.</p> <p>(3) There were 3 multi-pollutant monitoring sites in the Omaha MSA in 2019: 1616 Whitmore – SO<sub>2</sub> &amp; Ozone (2 pollutants); 24<sup>th</sup> &amp; O Streets (South Omaha) – Ozone and PM<sub>10</sub> (2 pollutants); and NCore (42<sup>nd</sup> &amp; Woolworth) – CO, NO-NO<sub>y</sub>, O<sub>3</sub>, SO<sub>2</sub>, and PM (8 pollutants). The number of monitoring sites by individual pollutant is thus greater than the number of monitoring locations within the Omaha MSA and for the state as a whole.</p> <p>(4) Cass County has limestone mining and processing facilities, which are subject to specific air emission rules for the county set forth in Chapter 21 of Nebraska Administrative Code Title 129 – Nebraska Air Quality Regulations.</p> <p>(5) IMPROVE – Interagency Monitoring of Protected Visual Environments. These are fine particulate and particulate speciation monitors intended to provide information for studying regional haze that may impact Class I National Park and wilderness Areas. IMPROVE sites are not part of the SLAMS network. EPA is responsible for the design of the IMPROVE network. Changes to the IMPROVE Network within Nebraska do not need to be included in Nebraska’s annual network plan, but the existence of the site is recognized within the network plans. The NDEE provides administrative support (with EPA funding) for one IMPROVE site at the Nebraska National Forest near Halsey, NE.</p> <p>(6) NADP - National Atmospheric Deposition Program sites are not part of the SLAMS network. They are not subject to 40 CFR Part 58 requirements and are not used for NAAQS attainment determinations. They are included in the Network Plan for informational purposes only.</p>					

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Figure V-2. Air Quality Monitor Locations in the Nebraska Portion of the Omaha-Council Bluffs Metropolitan Statistical Area, 3/31/2021.



**NCore**

4102 Woolworth Avenue

**Ozone**

Omaha, 4102 Woolworth Avenue (NCore)  
 Omaha, 1616 Whitmore Street  
 Omaha, 2411 O Street

**Carbon Monoxide**

Omaha, 4102 Woolworth Avenue (NCore Trace Monitor)  
 Omaha, 7747 Dodge Street

**Sulfur Dioxide (SO<sub>2</sub>)**

Omaha, 4102 Woolworth Avenue (NCore Trace Monitor)  
 Omaha, 1616 Whitmore Street

**PM<sub>10</sub>**

Omaha, 19<sup>th</sup> & Burt Streets  
 Omaha, 2411 O Street  
 Omaha, 4102 Woolworth Avenue (NCore)  
 Weeping Water, 102 P Street

**PM<sub>2.5</sub>**

Omaha, 4102 Woolworth Avenue (NCore)  
 Omaha, 9225 Berry Street  
 Bellevue, 2912 Coffey Avenue  
 Blair, 2242 Wright Street

**NADP/NTN/MDN**

Mead, Saunders County

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### VI. Nebraska Ambient Air Monitoring Network: January 1, 2020 through March 31, 2021

This section describes Nebraska's Ambient Air Monitoring Network in place from January 1, 2020 through March 31, 2021, and changes made during that period. Detailed information on individual monitoring sites, including purpose, scale, monitor specifications, and start dates is contained in Appendix A.

This section is organized around the Metropolitan Statistical Areas (MSAs) and Micropolitan Statistical Areas (MiSAs) in which monitoring is conducted.

#### A. Omaha-Council Bluffs MSA Sites Operated by the Douglas County Health Department (DCHD)

DCHD operates an ambient air network of eight sites in Douglas, Sarpy, and Washington Counties, Nebraska. Multi-pollutant monitoring is currently conducted at three of the sites:

- The NCore site monitors for eight pollutant parameters (CO, NO<sub>y</sub>/NO, O<sub>3</sub>, SO<sub>2</sub>, PM<sub>2.5</sub>, PM<sub>10</sub>, PM<sub>10-2.5</sub>, and PM<sub>2.5</sub> speciation), as well as meteorological parameters and atmospheric radiation (RADNET\*).
- The South Omaha site has both an ozone and a PM<sub>10</sub> monitor.
- The 1616 Whitmore site has both SO<sub>2</sub> and ozone monitors.

In addition, there are single-pollutant monitoring sites for carbon monoxide (one), PM<sub>2.5</sub> (three), and PM<sub>10</sub> (one). The Omaha area monitoring network is therefore more extensive than the eight-site total might indicate; if the pollutants are counted separately, there are 17 pollutant monitoring sites. See Appendix A for detailed information on the sites operated by DCHD.

NDEE and Iowa DNR share responsibilities for air quality monitoring in the Omaha-Council Bluffs MSA. Iowa currently relies on monitors in the Nebraska portion of the MSA to meet minimum monitoring requirements for ozone, PM<sub>2.5</sub>, PM<sub>10</sub>, and SO<sub>2</sub>.

\* Note: RadNet is a nationwide system that monitors the nation's air, drinking water, precipitation, and pasteurized milk to determine levels of radiation in the environment. RadNet sample analyses and monitoring results provide baseline data on background levels of radiation in the environment and can detect increased radiation from radiological incidents. The RadNet monitor is not subject to the network planning process set forth in 40 CFR Part 58.10. It is recognized above for informational purposes only.

Several changes have occurred in the DCHD monitoring network in Omaha since January 2020.

#### 1. Permanent Closure of the North Omaha Station Source-Oriented Monitor as allowed by the SO<sub>2</sub> Data Requirements Rule.

In accordance with rules set forth in 40 CFR Part 51 Subpart BB (known as the SO<sub>2</sub> Data Requirements Rule), DCHD began operating a source-oriented SO<sub>2</sub> monitoring site (AIRS ID 31-055-0057) at 7288 John Pershing Drive in early 2017 to characterize air quality near the Omaha Public Power District North Omaha Station coal-fired power plant. As reported in the 2020 Network Plan, data collected from 2017 through 2019 demonstrated a 3-year Design Value (DV) that was less than 50% of the NAAQS. Based on this finding, NDEE's 2020 Network Plan requested removal of the North Omaha Station SO<sub>2</sub> monitor, as allowed by the Data Requirements Rule. This request was approved by the Regional Administrator on December 22, 2020, effective January 1, 2021.

#### 2. Relocation of the 19<sup>th</sup> and Burt Streets PM<sub>10</sub> Monitor Site.

DCHD operated a population and source-oriented PM<sub>10</sub> monitoring site at 1909 Burt Street in Omaha starting in 2001. This site had primary and collocated filter-based samplers situated on the roof of a

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building owned by Creighton University. NDEE's 2019 Network Plan reported that DCHD had been informed that Creighton University planned to demolish this building to make way for new construction, with demolition to begin later in 2019. DCHD therefore began a search for suitable alternative locations for this monitoring site. In October 2019 the EPA Region 7 Administrator approved relocation of this site. However, the University subsequently informed DCHD that demolition plans had been postponed, and the monitors continued operating at the 1909 Burt Street location through 2020. The building demolition is now scheduled to proceed. Consequently, on March 10<sup>th</sup>, 2021, the monitors were relocated to a new rooftop site at 723 North 18<sup>th</sup> Street, one and one-half blocks east of the previous location.

### **B. Omaha-Council Bluffs MSA Sites Operated by NDEE**

NDEE operates a MetOne BAM continuous PM<sub>10</sub> sampler at the Weeping Water wastewater treatment plant in Cass County. This is a population and source-oriented site that monitors nearby limestone mining and processing facilities in the surrounding rural area.

### **C. Lincoln MSA Sites Operated by the Lincoln-Lancaster County Health Department (LLCHD)**

LLCHD operates two SLAMS monitoring sites:

- A PM<sub>2.5</sub> site at 3140 N Street in Lincoln, and
- An ozone site in Davey, NE (northern Lancaster County).

The N Street PM<sub>2.5</sub> site has three monitors: a primary filter-based Federal Reference Method (FRM) sampler, a collocated filter-based FRM sampler, and a continuous MetOne BAM monitor. Data from the continuous monitor is reported to AirNow but not to EPA's Air Quality System (AQS) database.

One change has occurred in the LLCHD monitoring network since January 1, 2020.

In accordance with rules set forth in the SO<sub>2</sub> Data Requirements Rule, LLCHD began operating a source-oriented SO<sub>2</sub> monitoring site (AIRS ID 31-109-0025) near Hallam, NE (SW 42<sup>nd</sup> Street, 0.2 miles north of West Pella Road) in early 2017 to characterize air quality near the Nebraska Public Power District Sheldon Generating Station coal-fired power plant. As reported in the 2020 Network Plan, data collected from 2017 through 2019 demonstrated a 3-year Design Value (DV) that was less than 50% of the NAAQS. Based on this data, NDEE's 2020 Network Plan requested removal of the Sheldon Station SO<sub>2</sub> monitor, as allowed by the Data Requirements Rule. This request was approved by the Regional Administrator on December 22, 2020, effective January 1, 2021.

### **D. Sioux City MSA in Dakota and Dixon Counties**

There are no monitoring sites in the Nebraska portion of the Sioux City MSA. There are two monitoring sites in the Iowa and South Dakota portions of the MSA:

- A PM<sub>10</sub>/PM<sub>2.5</sub> site in Sioux City operated by the Iowa DNR, and
- A multi-pollutant site for SO<sub>2</sub>, NO<sub>2</sub>, O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> in Union County, South Dakota operated by the South Dakota DENR.

NDEE has an agreement with South Dakota DENR that Nebraska relies on the Union County monitors and data to meet minimum monitoring requirements for ozone and SO<sub>2</sub> in the Sioux City MSA. Based on population size and ambient PM levels measured at the Iowa and South Dakota sites, PM<sub>10</sub> and PM<sub>2.5</sub> monitors are not currently required in the Sioux City MSA (see Table C-2 in Appendix C).



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### **E. Grand Island MSA**

NDEE began operating a filter-based FRM PM<sub>2.5</sub> sampler on the roof of Grand Island Senior High School in 2004. In 2019 NDEE acquired a continuous MetOne BAM 1020 Federal Equivalent Method (FEM) sampler as a replacement for the filter-based sampler. However, this rooftop location did not allow for a climate-controlled shelter required for operation of the continuous sampler, and NDEE was unable to obtain permission for a shelter elsewhere on the school grounds. As a result, NDEE relocated the Grand Island monitoring site about 2 miles south-southwest to a Nebraska Department of Transportation lot in Grand Island. The new site began operating on 11/26/2019, and the Grand Island Senior High School site was closed on 3/31/2020. The Grand Island continuous PM<sub>2.5</sub> data is reported to AirNow.

### **F. Scottsbluff MiSA**

NDEE operates a PM<sub>2.5</sub> monitoring site at Scottsbluff Senior High School. A filter-based FRM sampler operated at this location on a 3-day sampling schedule until 3/24/2020, when a MetOne BAM FEM continuous sampler was installed at the same location. NDEE staff were unable to correctly update the monitor information in the EPA AQS under the existing AIRS ID, so a new AIRS ID was assigned and the previous one marked as closed. The Scottsbluff continuous PM<sub>2.5</sub> data is reported to AirNow.

### **G. Fremont MiSA**

NDEE operated primary and collocated total suspended particulate lead samplers at 1255 Front Street in Fremont beginning in 2010 to provide source-oriented monitoring of the Magnus-Farley brass/bronze foundry. The site owner notified the Department in March 2018 that he no longer wished to host the lead monitors, which were removed from this location at the end of September 2018. An alternative location has been identified and approved by EPA Region 7, and NDEE staff are in negotiations with the property owner considering relocation of the monitors to that site.

### **H. Lexington MiSA**

Currently there are no ambient air monitoring sites in the Lexington MiSA.

### **I. IMPROVE Site**

IMPROVE is the acronym for Interagency Monitoring of Protected Visual Environments. These sites contain fine particulate and particulate speciation monitors intended to provide information for studying regional haze that may impact Class I National Park and Wilderness Areas. There are no Class I National Park and Wilderness Areas in Nebraska; the nearest sites are Rocky Mountain National Park in Colorado and Wind Cave National Park and Badlands National Park in South Dakota.

NDEE provides administrative support for one IMPROVE site at Halsey National Forest in Thomas County. Data collected at this site facilitates regional haze and pollution transport studies but is not used for NAAQS compliance.

### **J. National Atmospheric Deposition Program (NADP) / National Trends Network (NTN) and Mercury Deposition Network (MDN)**

The National Atmospheric Deposition Program/National Trends Network (NADP/NTN) is a federal, nationwide network of sites that monitor for air pollutants deposited by rain and snow. The deposition parameters examined include acidity, sulfate, nitrate, ammonium, chloride, and base cations (e.g., calcium, magnesium, potassium, and sodium).

There are two NADP/NTN sites in Nebraska: one near Mead (Saunders County) that has operated since 1978 and one near North Platte (Lincoln County) that has operated since 1985. These sites are operated by

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the University of Nebraska with analytical and data development support from the federal NADP. There were no changes to the NADP/NTN network from January 1, 2020 thru March 31, 2021.

Mercury Deposition Network (MDN) monitoring was initiated at the Mead site on June 26, 2007 and is continuing. At the North Platte site, MDN monitoring was conducted from October 2008 thru October 2010.

The operation of NADP sites is not subject to the provisions of 40 CFR Part 58.10. Their inclusion in this Network Plan is for informational purposes only. More information on the NADP/NTN and the NADP/MDN sites can be found in Appendix A of this network plan. For NADP, NTN and MDN program information see: <http://nadp.slh.wisc.edu>.

### VII. Considerations for Network Planning

#### A. EPA Air Monitoring and Network Design Requirements

The Nebraska Ambient Air Monitoring Network must comply with the applicable requirements of 40 CFR Part 58 Appendices A through E. As the review in Appendix C of this plan documents, the Nebraska network operated by NDEE, DCHD, and LLCHD is meeting all of the applicable requirements of 40 CFR Part 58 Appendices A, C, D, and E except for the PM<sub>2.5</sub> collocation requirements in Appendix A, as discussed below.

Part 58 Appendix B applies to Prevention of Significant Deterioration (PSD) monitoring as part of New Source Review. Monitoring required for PSD is generally conducted by the source rather than a state or local monitoring agency. Therefore, compliance with Appendix B is not directly addressed in this network plan. No PSD-required background monitoring took place in Nebraska during 2020.

40 CFR Part 58 Appendix A Section 3.2.3 specifies quality control sampling procedures for PM<sub>2.5</sub>, with respect to Federal Reference Method (FRM) and Federal Equivalent Method (FEM) samplers. This section requires that for each distinct monitoring method (FRM or FEM) that a Primary Quality Assurance Organization (PQAO) utilizes as a primary monitor, there must be a collocated quality control monitor at 15% of the monitor sites, with a minimum of one collocated monitor. The first collocated monitor must be a designated FRM monitor.

Currently NDEE is the PQAO for three PM<sub>2.5</sub> monitoring sites: Grand Island and Scottsbluff sites operated by NDEE and the Lincoln site operated by LLCHD. The Lincoln site has primary and collocated sequential FRM monitors that sample for 3-day and 6-day intervals, respectively. Prior to 2020, the Grand Island and Scottsbluff sites also each had a primary sequential FRM monitor with a 3-day sampling interval, and collocation at the Lincoln site satisfied the collocation requirement for the three sites.

As discussed in the 2020 Network Plan, in late 2019 and early 2020 NDEE replaced the FRM monitors at the Grand Island and Scottsbluff sites with continuous FEM samplers. Because NDEE now operates two sites with primary FEM PM<sub>2.5</sub> monitors, Appendix A Section 3.2.3 requires a collocated FRM sampler at one of the sites. NDEE proposes to meet this requirement by setting up a new PM<sub>2.5</sub> monitoring site near Beatrice, Nebraska with a primary continuous FEM sampler and a collocated FRM sampler (see section VIII below).

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### B. Air Quality and NAAQS Attainment

Nebraska's ambient air monitoring data for 2018 through 2020 show that all monitoring sites in Nebraska (and sites in portions of the Omaha and Sioux City MSAs in adjacent states) are in attainment with the NAAQS. See the monitoring data tables in Appendix B for the detailed results.

#### 1. Ozone

The current NAAQS for ozone ( $O_3$ ) was set in 2015 at 0.070 parts per million (ppm; or 70 parts per billion) for both the primary and secondary standard. The previous standard was 0.075 ppm. Nebraska's ozone monitoring network includes four sites in the Omaha and Lincoln MSAs plus an EPA-operated site at Santee, Nebraska. There is also an ozone monitor at the Union County, SD, site in the Sioux City MSA. Ozone monitoring is only required in Metropolitan Statistical Areas (MSAs), with the required number of monitors set by population and whether the most recent ozone Design Values (DVs) are greater or less than 85% of the ozone NAAQS. All of Nebraska's MSAs meet current ozone monitoring requirements (see Appendix C).

As shown in Appendix B, Table B-1, the 2018-2020 ozone DVs at monitoring sites in Nebraska and adjacent state areas are elevated but in attainment with the ozone NAAQS (ranging from 80% to 94% of the NAAQS). The highest ozone levels in Nebraska are found in the Omaha-Council Bluffs MSA, the Sioux City MSA, and at Santee. The map in Figure VII-1 shows the 2018-2020 ozone DVs for monitoring sites in Nebraska and surrounding states. Nearly all urban and rural monitoring sites in the region show DVs of 60 ppb or higher (a DV of 59.5 ppb is 85% of the NAAQS).

Ozone monitoring sites in the Kansas City metropolitan area and in the vicinity of Sioux Falls, South Dakota also show elevated design values. Because prevailing winds in eastern Nebraska are from the south to south-southeast during the warmer months of the ozone season, it is likely that there is considerable northwestward transport of ozone and/or ozone precursors through the corridor extending from Kansas City to Sioux Falls, including the Omaha and Sioux City MSAs. The highest ozone levels in the region are found in Denver, Fort Collins, and Colorado Springs, Colorado.

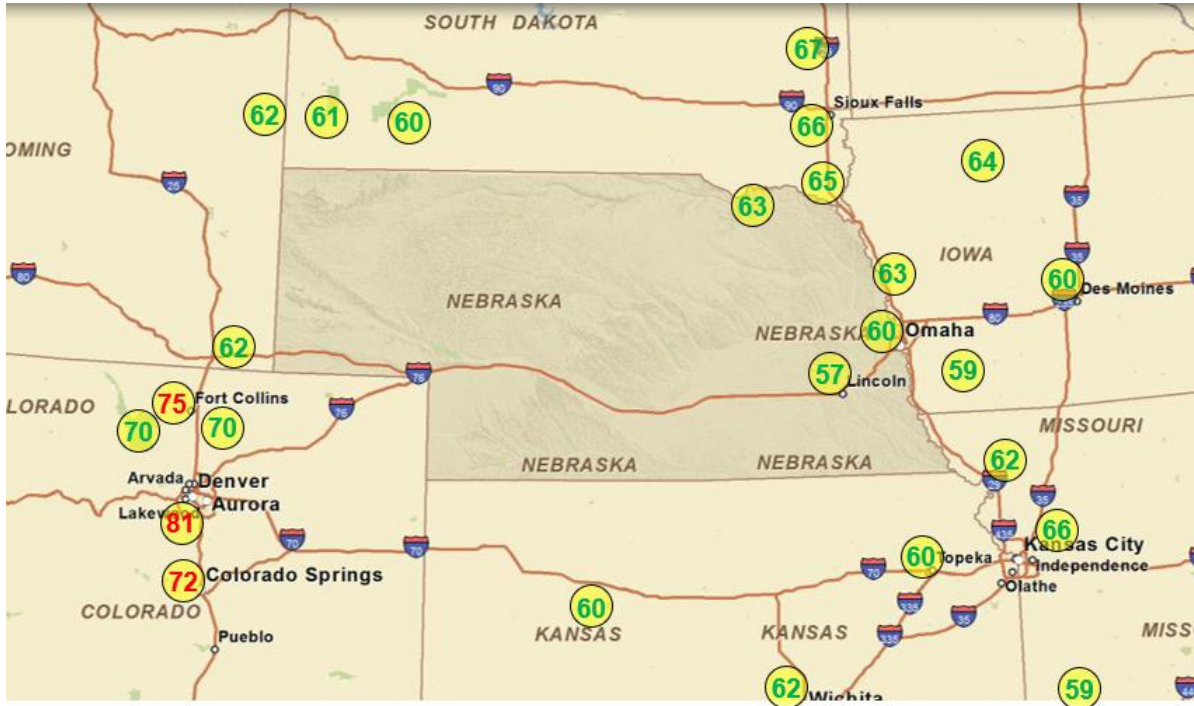
The map in Figure VII-2 shows the difference between the 2018-2020 ozone design value and the site-average design value from 2014 through 2019 for monitor sites in the Nebraska region. This period encompasses ozone trends since the historic drought year of 2012. Sites in Nebraska, Kansas, northwest Missouri, and southwest Iowa show 2018-2020 ozone design values that are equal to or slightly lower than the site averages. Sites in northwest Iowa and southern South Dakota experienced slightly above-average ozone levels for the 2018-2020 period.

Figures VII-3a, VII-3b, and VII-3c show plots of annual 4<sup>th</sup>-highest daily maximum 8-hour ozone values for monitors in the Omaha-Council Bluffs MSA, Lincoln and Sioux City MSAs, and for rural monitor sites in the region, respectively. Values are shown for 2013 through 2020. These values are used in calculating the 3-year average design values.

These plots show that most monitoring sites in the region experienced an upward trend in 4<sup>th</sup>-highest 8-hour ozone values from 2016 through 2018, followed by a declining trend continuing through 2020.

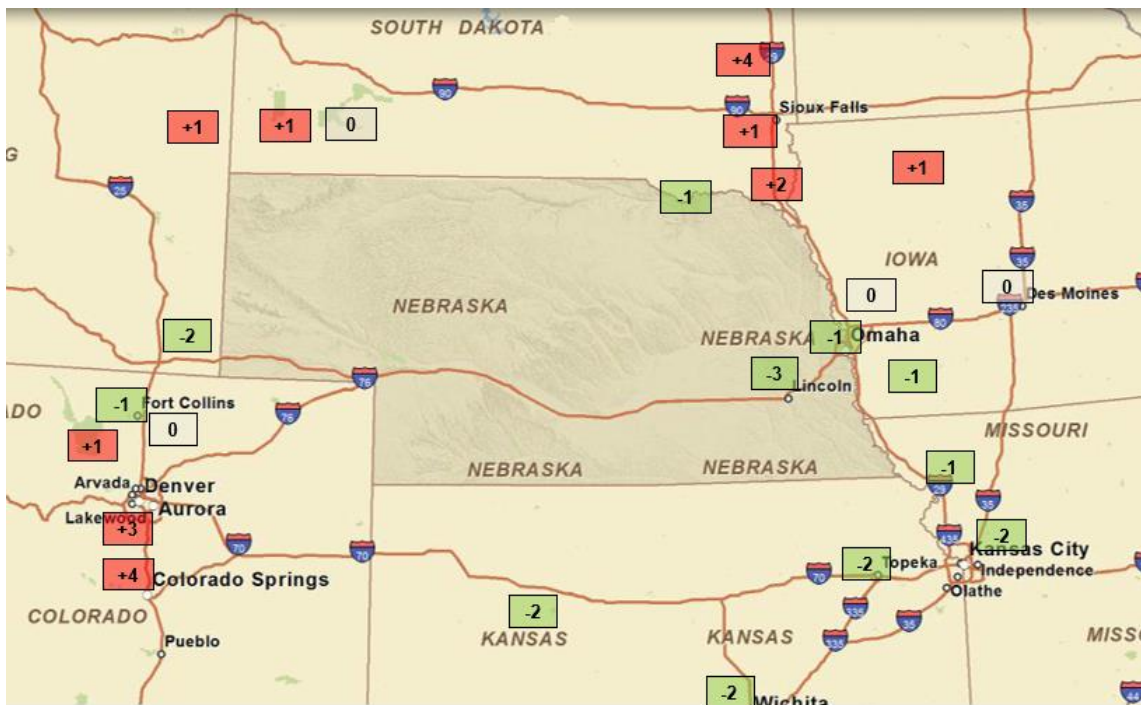
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**Figure VII-1. Three-Year (2018-2020) Ozone Design Values (DV, in ppb) for Locations in and Around Nebraska \***



\* Where there is more than one monitoring site in a locale, the highest ozone DV is shown. DVs in green are in attainment with the NAAQS (70 ppb); values in red are not in attainment.

**Figure VII-2. Difference Between 2018-2020 Ozone Design Value (ppb) and 2014-2019 Site Average Design Value for Monitor Sites in and Around Nebraska \***



\* Red background color in boxes indicates sites with a 2019 DV higher than the site average; green background color indicates sites with a 2019 DV lower than the site average. Where there is more than one monitoring site in the locale, the value for the site with the highest 2019 DV is shown.

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Figure VII-3a. Annual 4<sup>th</sup> High Daily Maximum 8-hour Ozone Trends 2013 through 2020 for Monitors in the Omaha-Council Bluffs MSA

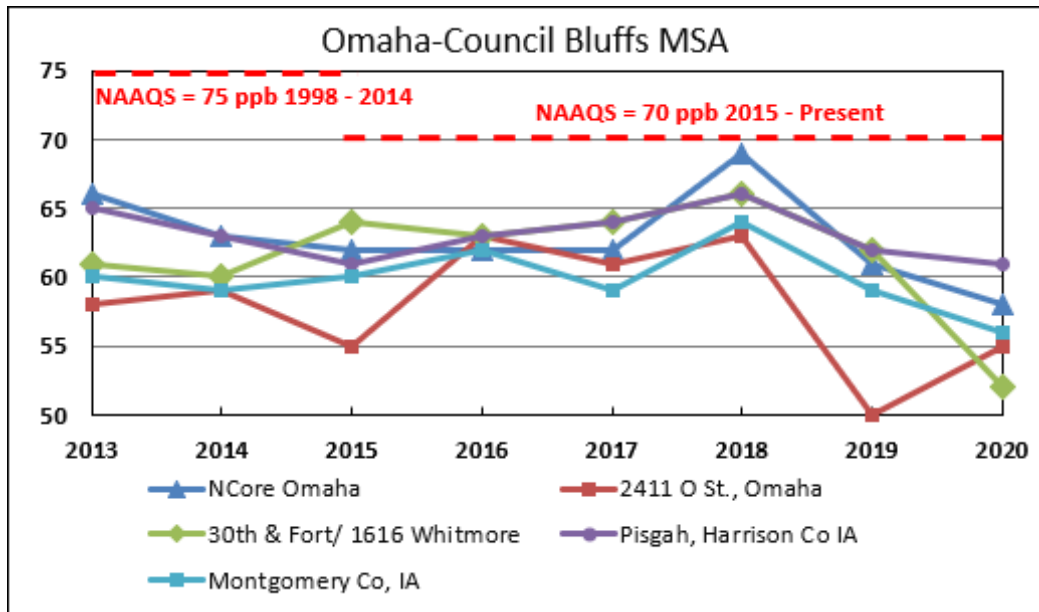
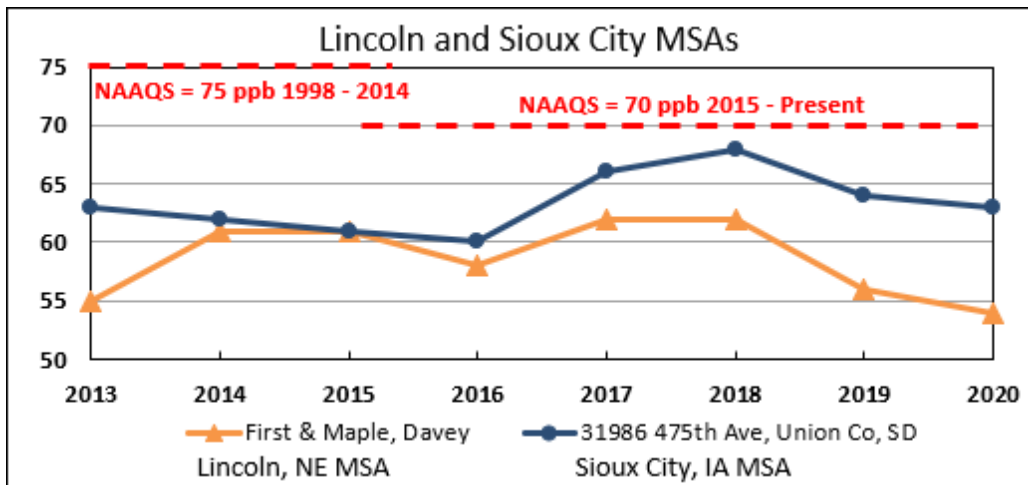
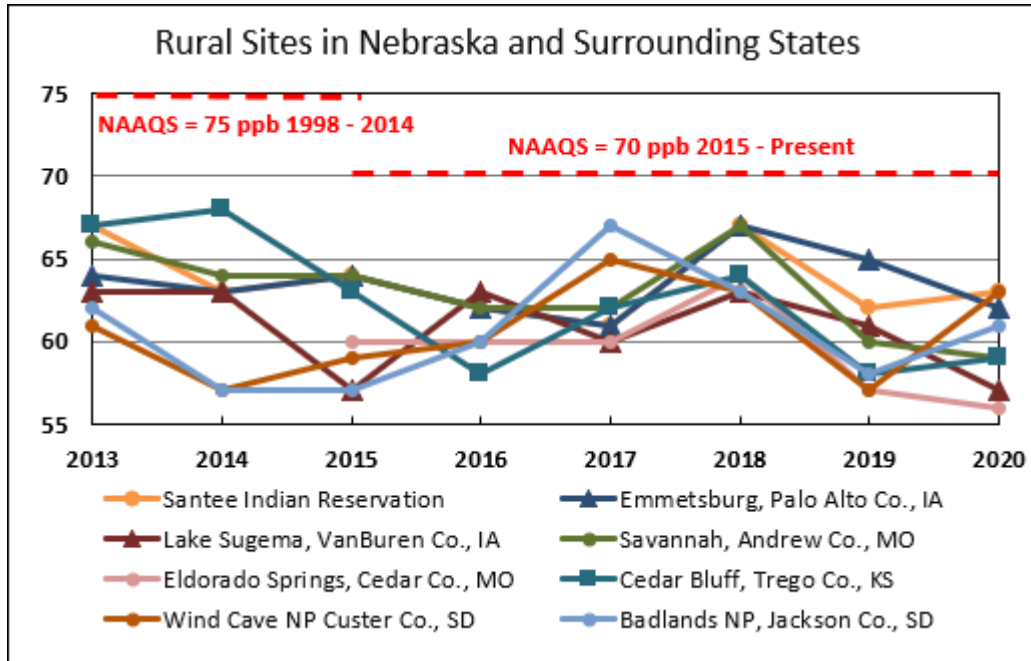


Figure VII-3b. Annual 4<sup>th</sup> High Daily Maximum 8-hour Ozone Trends 2013 through 2020 for Monitors in the Lincoln, NE and Sioux City, IA MSAs



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Figure VII-3c. Annual 4<sup>th</sup> High Daily Maximum 8-hour Ozone Trends 2013 through 2020 for Monitors at Rural Sites in Nebraska and Surrounding States



One change in the Nebraska ozone monitoring network is expected in 2021. The property owner at DCHD’s 2411 O Street site has requested removal of the ozone and PM<sub>10</sub> monitors. DCHD is working to locate and seek approval of a new ozone monitoring site in south Omaha.

2. Fine Particulate Matter: PM<sub>2.5</sub>

In December 2020 EPA announced that it would retain, without revision, the existing primary (health-based) and secondary (welfare-based) PM<sub>2.5</sub> NAAQS. The primary annual average NAAQS (based on the three-year average of the weighted annual mean) remains at 12 µg/m<sup>3</sup> and the 24-hour NAAQS (based on the three-year average of the annual 98<sup>th</sup> percentile of 24-hour maximum values) was retained at 35 µg/m<sup>3</sup>. As shown in Table VII-1 and in more detail in Appendix B Tables B-6a and B-6b, all monitored metropolitan areas in Nebraska are in attainment with the annual average and 24-hour PM<sub>2.5</sub> NAAQS. The highest values are found in the Omaha MSA and Sioux City MSA.

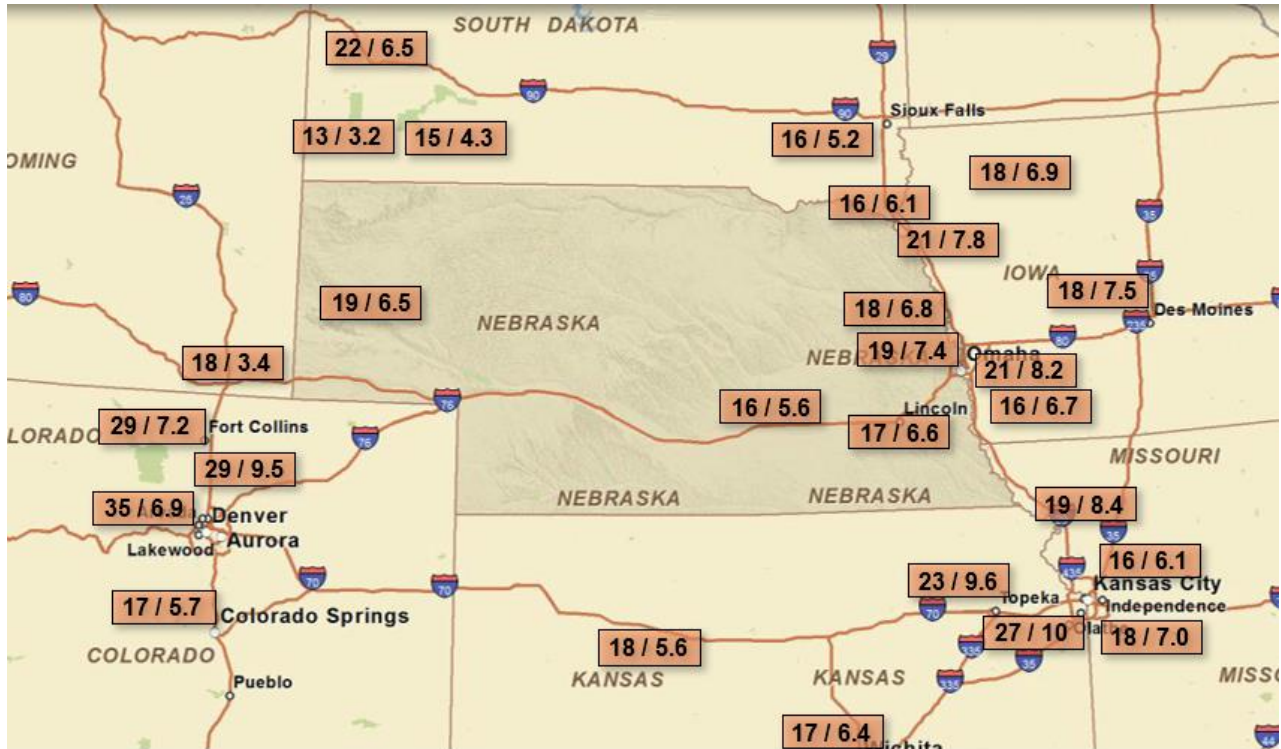
Location	24-Hour DV	Annual Average DV
Omaha MSA	59%	69%
Lincoln MSA	50%	55%
Sioux City MSA	60%	65%
Grand Island MSA	50%	46%
Scottsbluff MiSA	53%	54%

(1): Where there is more than one monitoring site in a locale, the highest DV is used to calculate the % NAAQS value shown above.

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Figure V-4 below shows the 2018-2020 Design Values for PM<sub>2.5</sub> monitoring sites in and around Nebraska. The highest values are measured in the larger metropolitan areas in the region (Omaha-Council Bluffs, Kansas City, and Denver). PM<sub>2.5</sub> values are generally lower in the smaller metropolitan and micropolitan areas and in rural areas.

**Figure VII-4. PM<sub>2.5</sub> 2018-2020 Design Values (DV) for Sites in and Around Nebraska** <sup>(1)(2)</sup>



Footnotes:

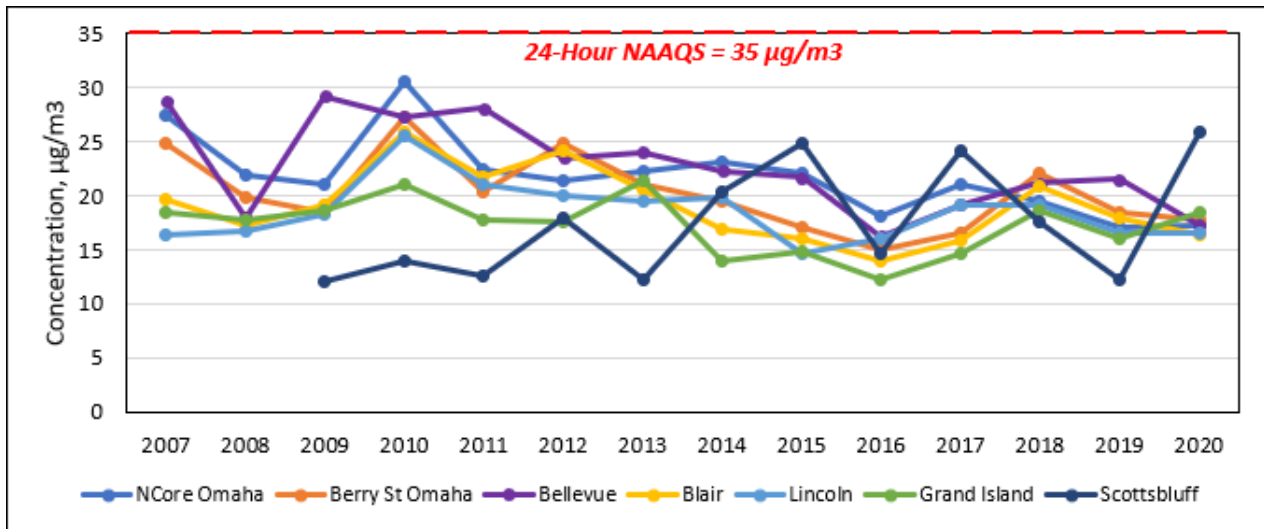
- (1) The first number is the 24-hour DV and the second number is the annual average DV.
- (2) Where there is more than one site in a metropolitan area, the highest DVs are shown.

Figures VII-5 and VII-6 plot trends in PM<sub>2.5</sub> values from 2007 through 2020 for the annual 98<sup>th</sup> percentile of daily maximum 24-hour data and the annual average data, respectively. From 2010 through 2016 most stations show an overall downward trend in both parameters, but since 2016 mixed trends are evident, with small overall increases or decreases at different sites.

The Scottsbluff site is an exception. Low annual average values were recorded from 2009 through 2016, after which there were several years with much higher values. The 98<sup>th</sup> percentile data show more variability, as expected, with high values in 2015, 2017, and 2020. The highest daily values in 2017 coincided with a widespread smoke plume from wildfires in the western states and a cluster of fires in southeastern Montana and northern Wyoming. The 2020 values were also affected by smoke from wildfires in Colorado and Wyoming for much of September and October. In addition, in 2020 the filter-based monitor that record data over 3-day intervals was replaced by a continuous monitor. The 2020 annual values were calculated from the continuous data recorded over only 252 days and are thus not representative of the entire year and are not valid for NAAQS comparison. Both the 98<sup>th</sup> percentile daily maximum and the annual average value are likely to be anomalously high due to the shorter period of data collection.

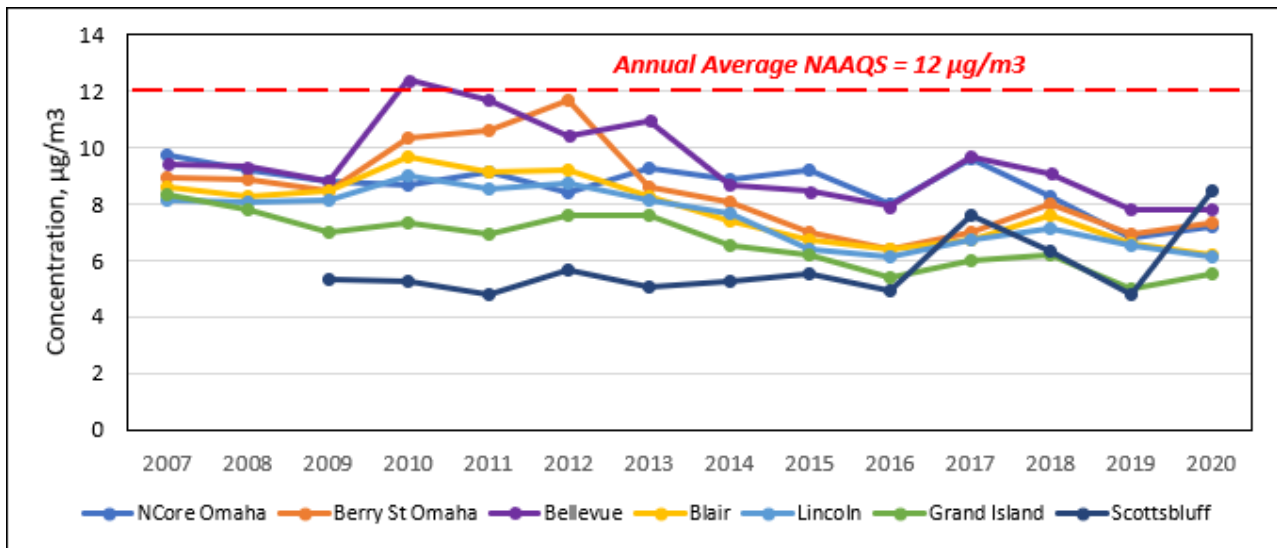
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Figure VII-5. Trends in Annual 98<sup>th</sup> Percentile of Daily Maximum 24-hour PM<sub>2.5</sub> for Nebraska Monitoring Sites 2007-2020 <sup>(1)</sup>



Footnote (1): A new continuous monitor was installed at Scottsbluff in 2020. The 2020 value shown was computed from only 252 days of continuous monitor data and is thus not valid for NAAQS comparison.

Figure VII-6. Trends in Annual Average PM<sub>2.5</sub> for Nebraska Monitoring Sites 2007-2020 <sup>(1)</sup>



Footnote (1): A new continuous monitor was installed at Scottsbluff in 2020. The 2020 value shown was computed from only 252 days of continuous monitor data and is thus not valid for NAAQS comparison.

As noted above, wildfires and prescribed fires can impact air quality and PM<sub>2.5</sub> levels in Nebraska. Prescribed burns are used in Nebraska and near-by states for prairie conservation and maintenance of grazing lands. The Flint Hills of Kansas and Oklahoma, and areas near the Flint Hills in Kansas, are areas of concentrated use of prescribed fires, primarily in the spring months. Smoke from prescribed fires in the Flint Hills and nearby areas was a major source of elevated PM<sub>2.5</sub> levels experienced in Lincoln and Omaha in early April 2017. Since then favorable weather patterns during Flint Hills burn events have resulted in minimal impacts on air quality in Nebraska.



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NDEE is working with Kansas Department of Health and Environment (KDHE), EPA Region 7, local air quality agencies, and other stakeholders on strategies to improve air quality in Nebraska during the spring prescribed burn season. To provide up-to-date information to the public regarding prescribed burning, NDEE created a smoke awareness web page in March 2017. During the burn season, current smoke forecast information is provided along with links to the Kansas Smoke Management Plan, AirNow, and other related information. NDEE has also collaborated with the Nebraska Department of Health and Human Services (DHHS), LLCHD, and DCHD to develop a public smoke advisory system that was announced on April 10, 2018. Smoke advisories are issued by DHHS for impacted counties based on forecasts provided by KDHE.

Two changes in Nebraska's PM<sub>2.5</sub> network are planned for 2021. As noted in the 2020 Network Plan, NDEE has purchased a MetOne BAM continuous PM<sub>2.5</sub> sampler and climate-controlled enclosure to replace the current filter-based sampler operated by DCHD in Blair, Nebraska. Due to the COVID-19 pandemic, the new continuous sampler has not yet been installed in Blair. This replacement is expected to be completed in 2021. As noted in section V.A.1 of this plan, NDEE plans to install a new PM<sub>2.5</sub> monitoring site near Beatrice, Nebraska with a primary continuous FEM sampler and a collocated FRM sampler (see section VIII below).

### 3. Coarse Particulate Matter: PM<sub>10</sub>

Coarse particulate matter (PM<sub>10</sub>) remains more localized to the source than PM<sub>2.5</sub>. The current national ambient air quality 24-hour standard (NAAQS) for PM<sub>10</sub> is 150 µg/m<sup>3</sup> for both the primary standard and the secondary standard. These standards were retained by EPA in December 2020. The PM<sub>10</sub> NAAQS states that the 24-hour standard of 150 µg/m<sup>3</sup> is not to be exceeded more than once per year on average over the latest 3-year time frame, where an exceedance is a 24-hour average value of 155 µg/m<sup>3</sup> or more. This means that the 4<sup>th</sup> highest value over the most recent 3 years needs to be below 155 µg/m<sup>3</sup> to avoid an exceedance.

There are five PM<sub>10</sub> monitoring sites in the Omaha MSA: three in Omaha operated by DCHD, one in Council Bluffs operated by Iowa DNR, and a source-oriented monitor in Weeping Water, Nebraska, operated by NDEE. South Dakota DENR operates a monitor in Union County, SD in the Sioux City MSA. There were no 24-hour exceedances of the 150 µg/m<sup>3</sup> value over the 2018-2020 period at any of these sites, so all are in attainment with the NAAQS. The 4<sup>th</sup> highest value over that period ranged from 29% to 47% of the NAAQS at these sites (see Appendix B, Table B-5a and B-5b).

One change in Nebraska's PM<sub>10</sub> monitoring network is expected in 2021. As noted in section VII.B.1, the property owner at DCHD's 2411 O Street site has requested removal of the ozone and PM<sub>10</sub> monitors. DCHD is working to locate and seek approval of a new PM<sub>10</sub> monitoring site in south Omaha.

### 4. Sulfur Dioxide (SO<sub>2</sub>)

The NAAQS for sulfur dioxide (SO<sub>2</sub>) was revised in 2010 to establish a 1-hour standard of 75 ppb (99<sup>th</sup> percentile of daily maximum 1-hour average concentrations), which was reviewed and retained in 2018. All areas of Nebraska were designated as "Attainment/Unclassifiable" with respect to this standard in 2016 except for Lancaster County, which was designated "Unclassifiable", and Douglas County, which was designated "Attainment/Unclassifiable" in 2020, effective 4/30/2021. Nebraska has submitted a recommendation to designate Lancaster County as "Attainment/Unclassifiable" based on source-oriented monitoring.

DCHD operates two SO<sub>2</sub> monitors in Omaha, one at the multipollutant NCore site and the other in an industrial area in north Omaha. As discussed in sections VI.A.1 and VI.C above, SO<sub>2</sub> monitoring was also carried out from 2017 through 2020 adjacent to coal-fired electrical generating plants in north

## Nebraska 2021 Ambient Air Monitoring Network Plan

Omaha and in southwest Lancaster County in accordance with rules set forth in 40 CFR Part 51 Subpart BB (known as the SO<sub>2</sub> Data Requirements Rule). The three-year design values at these two sites were below the threshold that would have required continued monitoring under the Data Requirements Rule. EPA approved termination of monitoring at these sites at the end of 2020.

Currently SO<sub>2</sub> monitors are not required in the other Nebraska MSAs, but South Dakota DENR monitors SO<sub>2</sub> at the multipollutant site in Union County, SD, within the Sioux City MSA.

The 2018-2020 1-hour SO<sub>2</sub> annual levels and Design Values (DVs) for Nebraska-area monitoring sites are listed in Appendix B, Table B-3. These tables include all monitors that were operating in 2020. The highest DVs were recorded at the two north Omaha sites: Whitmore Street (45% of the NAAQS) and the John Pershing Drive coal-fired powerplant site (48%). The DV at the neighborhood-scale Omaha NCore site was 15% of the NAAQS and only 4% at the rural Union County, SD, site.

Nebraska also has three areas that are subject to ongoing requirements of the Data Requirements rule by demonstrating attainment with the 2010 SO<sub>2</sub> NAAQS by air quality modeling. As required by 40 CFR 51.1205(b), NDEE is submitting an annual report to document the SO<sub>2</sub> emissions of each applicable source in these areas and assess the cause of any emissions increase from the previous year. This report is being submitted as Appendix D of this Network Plan.

### 5. Nitrogen Dioxide (NO<sub>2</sub>)

In 2010 EPA established a primary 1-hour NAAQS for NO<sub>2</sub> of 100 parts per billion (ppb; based on the 98th percentile of the annual distribution of daily maximum 1-hour NO<sub>2</sub> concentrations, averaged over 3 years) and retained a primary and secondary annual average standard of 53 ppb. Both standards were retained in 2018. EPA has designated all areas of Nebraska (and all areas of the country) as “unclassifiable/attainment” with respect to these standards.

Currently there are no NO<sub>2</sub> monitoring sites within Nebraska. South Dakota DENR monitors NO<sub>2</sub> at the multipollutant site in Union County, SD, within the Sioux City MSA. This is an area background site with a 2018-2020 design value that is 17% of the NAAQS (see Appendix B, Table B-4a).

At multipollutant NCore sites EPA requires measurement of reactive oxides of nitrogen (NO<sub>y</sub>) instead of NO<sub>2</sub> in order to quantify more of the oxidation products of nitric oxide (NO). These additional oxidation products are relevant to the secondary formation of ozone and PM<sub>2.5</sub>. NO and NO<sub>y</sub> are therefore measured at the Omaha NCore site.

The difference between measured NO<sub>y</sub> and NO (NO<sub>y</sub>-NO) generally approximates NO<sub>2</sub>, with NO<sub>y</sub>-NO being equal to or possibly higher than NO<sub>2</sub>. Table B-4b in Appendix B shows the measured NO<sub>y</sub>-NO annual values for 2018-2020. The three-year average of the 98<sup>th</sup> percentile 1-hour NO<sub>y</sub>-NO levels at the Omaha NCore site was 38% of the NAAQS, while the annual average value was 10% of the NAAQS.

### 6. Carbon Monoxide (CO)

Vehicle emissions are a primary source of carbon monoxide emissions. EPA last reviewed the carbon monoxide NAAQS in 2011, at which time it retained a primary 1-hour standard of 35 parts per million (ppm) and a primary 8-hour standard of 9 ppm. The Omaha NCore site includes a required neighborhood-scale CO monitor, and DCHD also operates a near-road, highest-concentration site at 78<sup>th</sup> and Dodge Streets in Omaha. As shown in Table B-2 in Appendix B, during the 2018-2020 time frame both sites recorded CO design values 5% or less of the 1-hour NAAQS and less than 20% of the 8-hour standard.

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### 7. Lead (Pb)

The lead NAAQS was last changed in 2008, when it was tightened from a concentration of 1.5  $\mu\text{g}/\text{m}^3$  to 0.15  $\mu\text{g}/\text{m}^3$  as determined from the highest three-month average concentration of suspended particulates in the last three years. This standard was reviewed and retained in 2016. EPA requires source-oriented SLAMS lead monitoring near industries that emit over 0.5 tons per year of lead. The rule allows for the EPA Regional Administrator to waive the monitoring requirements if the air agency can demonstrate that the lead source will not contribute to a maximum lead concentration in ambient air in excess of 50% of the NAAQS. This demonstration can be made through historical monitoring data or air dispersion modeling.

Currently there are two lead sources in Nebraska that are potentially subject to the lead monitoring requirement.

#### a. Nucor Steel, Norfolk (Lead Monitoring Waiver)

In April 2014 EPA approved a lead monitoring waiver request from Nucor Steel that provided modeling demonstrating that ambient lead levels would not exceed 50% of the NAAQS. The waiver was effective for five years and thus expired in April 2019.

Nebraska's 2019 Ambient Air Quality Monitoring Network Plan included a request to renew the Nucor Steel lead monitoring waiver for an additional five years. Modeling presented with the request predicted three-month rolling average lead emissions of 0.04  $\mu\text{g}/\text{m}^3$ , or 27% of the lead NAAQS. EPA Region 7 approved this waiver as part of the 2019 Network Plan in October 2019. The waiver will be in force until April 2024.

#### b. Magnus Farley, Fremont

Magnus-Farley is a bronze and brass casting facility in Fremont, Nebraska. Nebraska operated a lead monitoring site at 1255 Front Street, adjacent to this facility, beginning in 2010. The site had primary and collocated total suspended particulate samplers. In 2012 the maximum three-month average ambient lead level was 0.14  $\mu\text{g}/\text{m}^3$  or 93% of the NAAQS. In 2016 through 2018 the maximum three-month average lead concentrations were lower at 41%, 28%, and 16% of the NAAQS, respectively. Facility awareness and diligence, coupled with agency feedback on ambient air lead concentrations, appear to have facilitated the air quality improvements.

In 2018 the landowner that hosted this monitoring site asked that the monitors be removed; removal occurred at the end of September 2018. NDEE and EPA Region 7 staff evaluated several alternative monitoring sites, and EPA approved the relocation requested in Nebraska's 2019 Network Plan. However, negotiation of a site hosting agreement has been delayed due to COVID-19 health concerns. Lead monitoring will resume at the new site when negotiation of a site hosting agreement is concluded.

### C. Population Trends and Network Design

Population data is reviewed as part of the network planning process because:

- Population growth may be associated with pollution source growth.
- High population density generally correlates with high air pollution potential.
- Some 40 CFR Part 58 requirements are based on population and/or federally defined metropolitan statistical definitions.

## Nebraska 2021 Ambient Air Monitoring Network Plan

Overall growth trends in Nebraska appear basically unchanged from those described in previous annual Network Plans. Most population growth is occurring in Nebraska's three most populous and densely populated counties: Douglas, Lancaster, and Sarpy (i.e., the Omaha and Lincoln MSAs). Many rural counties in the state have declining populations.

The basic design of the Nebraska ambient air monitoring network is consistent with these population trends: 71% of the monitoring sites and 87% of the pollutant monitors are located within the Omaha and Lincoln MSAs. The Omaha MSA network contains 59% of the monitoring sites in Nebraska and 78% of the monitors.

### **D. Funding**

Air monitoring is supported by a combination of federal, cash, state, and local funding sources. Table VII-2 on the next page provides a summary of the primary funding sources used for air monitoring.

Federal CAA §103 funding is used to operate PM<sub>2.5</sub> and IMPROVE monitors. Funding for April 2020 through March 2021 was maintained at the same level as the previous year.

Current funding levels are adequate to continue the operation of the existing and planned Nebraska air monitoring network, provided major new equipment purchases are not required.

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<b>Table VII-2: Primary Funding Sources Used to Support Air Monitoring in Nebraska</b>	
<b>Nebraska Department of Environment and Energy (NDEE)</b>	
Funding Source	Comments
State General Funds	At a minimum must be sufficient to meet minimum federal match requirements
State Title V Funds	Fees paid by major sources based on the quantity of air pollutants they emit. NDEE collects Title V fees for sources throughout Nebraska, except those regulated by LLCHD and Omaha Air Quality Control. Title V funds cannot be used for state/local match.
CAA §105 Funds	Federal grant funds used for air monitoring activities set forth in a bi-annually negotiated EPA-NDEE work plan. Requires a 40% state/local match. A portion of this grant funding is passed on to DCHD and LLCHD.
CAA §103 Funds	Federal grant funds used for air monitoring activities set forth in a bi-annually negotiated EPA-NDEE work plan. This money is currently limited to funding PM <sub>2.5</sub> and IMPROVE monitoring, and sometimes for specified equipment purchases and/or special monitoring studies. Requires no state/local match. A portion of this grant funding is passed on to DCHD and LLCHD.
<b>Douglas County Health Department (DCHD)</b>	
Local County Funds	At a minimum must be sufficient to meet minimum federal match requirements
City of Omaha Title V funds	See <i>State Title V Funds</i> comments above. Omaha Air Quality Control regulates air emission sources in the City of Omaha, including the collection of Title V fees from major sources. A portion of the Omaha Title V funds are directed to DCHD to support air monitoring. Title V funds cannot be used for state/local match.
CAA §105 Funds	NDEE passes through a portion of the Federal §105 funds to DCHD for activities described in an NDEE/DCHD work plan. DCHD is required to meet the 40% state/local match requirement.
CAA §103	NDEE passes through a portion of the federal §103 funds to DCHD for activities described in an NDEE/DCHD work plan, primarily PM <sub>2.5</sub> related monitoring activities. There is no state/local match requirement.
Metropolitan Area Planning Assoc. (MAPA) Funds	Federal grant funds obtained by MAPA are for specific purposes such as transportation or homeland security. Historically they have been used for equipment purchases and site set-up, not network operating costs.
<b>Lincoln Lancaster County Health Department (LLCHD)</b>	
Local County Funds	At a minimum must be sufficient to meet minimum federal match requirements
Lancaster County Title V funds	See <i>State Title V Funds</i> comments above. LLCHD regulates air emission sources in Lancaster County, including the collection of Title V fees from major sources. A portion of the Title V funds are used to support air monitoring activities performed by LLCHD. Title V funds cannot be used for state/local match.
CAA §105 Funds	NDEE passes through a portion of the Federal §105 funds to LLCHD for activities described in an NDEE/LLCHD work plan. LLCHD is required to meet the 40% state/local match requirement.
CAA §103	NDEE passes through a portion of the federal §103 funds to LLCHD for activities described in an NDEE/LLCHD work plan, primarily PM <sub>2.5</sub> related monitoring activities. There is no state/local match requirement.

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### VIII. Anticipated Nebraska Ambient Air Monitoring Network Modifications

#### A. Relocation of Ozone and PM<sub>10</sub> Monitors from 2411 O Street, Omaha

Douglas County Health Department (DCHD) has operated an ozone and PM<sub>10</sub> monitoring site at 2411 O Street in south Omaha since 1978. As discussed in sections VI.B.1 and VI.B.3 above, in late 2020 the owner of that property requested the removal of the monitors. Ozone monitoring ceased at the end of October 2020 (the end of the ozone monitoring season), but the property owner has allowed PM<sub>10</sub> monitoring to continue. DCHD is working to locate and seek approval of a new ozone and PM<sub>10</sub> monitoring site (or sites) in south Omaha.

#### B. New PM<sub>2.5</sub> Monitoring Site at Homestead National Historical Park near Beatrice, NE

As noted in section V.A.1 of this document, NDEE currently operates two PM<sub>2.5</sub> monitoring sites (Grand Island and Scottsbluff) with primary FEM continuous monitors. In order to satisfy PM<sub>2.5</sub> collocation requirements, a sequential FRM sampler must be collocated at one NDEE site with a primary FEM sampler.

NDEE proposes to satisfy the collocation requirement by setting up a new PM<sub>2.5</sub> monitoring site at Homestead National Historical Park three miles northwest of Beatrice, in Gage County, Nebraska (Beatrice MiSA). The Homestead site is approximately 35 miles south-southwest of Lincoln (see Figure VIII-1). When spring winds are from the south, this site is in the potential path of smoke from prescribed burning in the Kansas Flint Hills. In the spring of 2018, the Lincoln-Lancaster County Health Department operated an investigatory continuous PM<sub>2.5</sub> sampler at this location to monitor for possible smoke impacts between Lincoln and the Kansas border. The location therefore has the infrastructure and site characteristics required to host the PM<sub>2.5</sub> monitoring station.

**Figure VIII-1. Location map of proposed PM<sub>2.5</sub> monitoring site at Homestead National Historical Park near Beatrice.**



NDEE plans to install a new primary continuous FEM sampler and a new collocated FRM sampler at a location adjacent to the park headquarters building. When this site is operational NDEE will have three PM<sub>2.5</sub> sites with primary FEM samplers, one of which will have a collocated FRM sampler, in accordance with the collocation requirement.

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### **C. Replacement of Sequential PM<sub>2.5</sub> Monitor with Continuous Monitor in Blair, NE**

As noted in the 2020 Network Plan, NDEE has purchased a MetOne BAM continuous PM<sub>2.5</sub> sampler and climate-controlled enclosure to replace the current filter-based sampler operated by DCHD in Blair, Nebraska. Due to the COVID-19 pandemic, the new continuous sampler has not yet been installed in Blair. This replacement is expected to be completed in 2021.

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**Nebraska 2021 Ambient Air Monitoring Network Plan**

**Appendix A: Ambient Air Monitoring Sites in Nebraska**

See Appendix C for a compliance review with respect to 40 CFR Part 58 Appendixes A through E.

**Omaha NCore Site Operated by DCHD**

<b>Site Name: Omaha NCore</b> <sup>(1)</sup>		AIRS ID: 31-055-0019 <sup>(1)</sup>	
<b>Location: 4102 Woolworth Ave., Omaha</b>		Latitude: 41.246792° Longitude: -95.973964°	
Operating Agency: Douglas County Health Department			
Purpose: NCore		Scale: Neighborhood	
<b>Monitor/Pollutant: Carbon Monoxide (CO) - Trace Level</b>			
Type/POC: Primary / POC 01		Monitoring Frequency: Continuous	
Analyzer/Sampler: Thermo 48i-TLE		EPA Method: RFCA-0981-054 (AQS 554)	
Start-Up Date: 1/20/11		Closure Date: Currently operating	
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
<b>Monitor/Pollutant: Ozone (O<sub>3</sub>)</b>			
Type/POC: Primary / POC 01		Monitoring Frequency: Continuous	
Analyzer/Sampler: Thermo 49i		EPA Method: EQOA-0880-047	
Start-Up Date: 4/1/11		Closure Date: Currently operating	
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
<b>Monitor/Pollutant: Nitrogen Oxides (NO/NO<sub>y</sub>)</b>			
Type/POC: Primary / POC 01		Monitoring Frequency: Continuous	
Analyzer/Sampler: Thermo 42i NO/NO <sub>2</sub> /NO <sub>x</sub>		EPA Method: RFNA-1289-074	
Start-Up Date: 1/20/11		Closure Date: Currently operating	
Data used for NAAQS comparison: Not Applicable. Monitors for NO & NO <sub>y</sub> , but not NO <sub>2</sub>			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
<b>Monitor/Pollutant: Sulfur Dioxide (SO<sub>2</sub>) – Trace Level</b>			
Type/POC: Primary / POC 01		Monitoring Frequency: Continuous	
Analyzer/Sampler: Thermo 43i-TLE		EPA Method: EQSA-0486-060 (AQS 560)	
Start-Up Date: 1/20/11		Closure Date: Currently operating	
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
<b>Monitor/Pollutant: PM<sub>2.5</sub></b> <sup>(2)</sup>			
Type/POC: Primary Continuous / POC 01		Monitoring Frequency: Continuous	
Analyzer/Sampler: Met One BAM-1020 <sup>(2)</sup> <sup>(3)</sup>		EPA Method: EQPM-0308-170	
Start-Up Date: 2/1/04 <sup>(2)</sup>		Closure Date: Currently operating	
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
<b>Monitor/Pollutant: PM<sub>2.5</sub></b> <sup>(2)</sup>			
Type/POC: POC 02		Monitoring Frequency: Once every 6 days	
Analyzer/Sampler: Met One E-SEQ-FRM <sup>(2)</sup>		EPA Method: RFPS-0717-245	
Start-Up Date: 1/1/99 <sup>(2)</sup>		Closure Date: Currently operating	
Data used for NAAQS comparison: Only when POC 1 data is not available.			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
<b>Monitor/Pollutant: PM<sub>2.5</sub> Speciation</b>			
Type/POC: Speciation / POC 05		Monitoring Frequency: Once every 3 days	
Analyzer/Sampler: PM <sub>2.5</sub> Speciation		Sampler Type: SASS and a 3000 URG <sup>(3)</sup>	
Start-Up Date: 5/25/01		Closure Date: Currently operating	
Data used for NAAQS comparison: Not applicable			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
Continued on next page			

**Nebraska 2021 Ambient Air Monitoring Network Plan**

**Appendix A: Ambient Air Monitoring Sites in Nebraska**

**Omaha NCore Site Operated by DCHD - continued**

<b>Site Name: Omaha NCore</b>		AIRS ID: 31-055-0019 (See Comment 1)	
<b>Location: 4102 Woolworth Ave., Omaha</b>		Latitude: 41.246792°	Longitude: -95.973964°
Operating Agency: Douglas County Health Department		(continued from previous page)	
<b>Monitor/Pollutant: PM<sub>10</sub> – STP &amp; Local Conditions</b>			
Type/POC: Continuous / POC 01	Monitoring Frequency: Continuous		
Analyzer/Sampler: Met One BAM-1020 <sup>(3)</sup>	EPA Method: EQPM-0798-122		
Start-Up Date: 1/1/11 <sup>(3)</sup>	Closure Date: Currently operating		
Data used for NAAQS comparison: Local conditions data only			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
<b>Monitor/Pollutant: PM<sub>10-2.5</sub> – Local Conditions</b>			
Type/POC: Continuous / POC 01	Monitoring Frequency: Continuous		
Analyzer/Sampler: Met One BAM-1020 <sup>(3)</sup>	EPA Method: EQPM-0709-185		
Start-Up Date: 1/1/11 <sup>(3)</sup>	Closure Date: Currently operating		
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
<b>Monitor/Pollutant: Lead (Pb) – Non-source oriented</b>			
Type/POC: Primary / POC 01	Monitoring Frequency: Once every 6 days		
Analyzer/Sampler: Hi-Vol TSP-Pb (ICP-MS)	EPA Method: EQL-0310-189		
Start-Up Date: 12/1/12	Closure Date: 12/31/17		
Data used for NAAQS comparison: NA (not operating)			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: NA (site closed)			
<b>Meteorological Parameters – Manufacturer &amp; Model – Start Date</b>			
Wind Direction & Velocity – MetOne 50.5 Sonic - 5/13/11			
Temperature - MetOne Model 083D – 4/12/11	Barometric Pressure – MetOne Model 090D – 4/12/11		
Relative Humidity – MetOne 083D – 4/12/11	Solar Radiation – MetOne Model 096-1 – 4/12/11		
Closure Date: Currently operating			
<b>Atmospheric Radiation – RadNet Air Monitor</b>			
RadNet is a nationwide system that monitors the nation’s air, drinking water, precipitation, and pasteurized milk to determine levels of radiation in the environment. RadNet sample analyses and monitoring results provide baseline data on background levels of radiation in the environment and can detect increased radiation from radiological incidents. The RadNet monitor is not subject 40 CFR Part 58 requirements. It is recognized in this Network Plan for informational purposes only. The RadNet monitor began operating at the Woolworth site in June 2006.			
Comments:			
<ol style="list-style-type: none"> <li>1. Site History: Site 31-055-0019 was referred to as the “Woolworth site” through 12/31/10. The Woolworth site was a PM monitoring site with PM<sub>2.5</sub> filter-based, continuous and speciation monitors located on the roof of Douglas County Hospital. To accommodate NCore monitoring, more space was required and the site was moved approximately 550 ft north to the roof of an adjacent/attached building in December 2010. Gaseous and meteorological monitors began operation in 2011 and lead in 2012. Lead monitoring was discontinued at the end of 2017 in accordance with the 2017 Network Plan. Permanent discontinuation of lead monitoring was approved by EPA Region 7 in December 2018.</li> <li>2. On 1/1/99 PM<sub>2.5</sub> sampling was initiated using primary and collocated R&amp;P 2025 filter-based FRM samplers. A continuous monitor was first operated at this site 2/1/04. It was replaced by a MetOne BAM FEM monitor on 1/6/09. The MetOne BAM was operated as an auxiliary monitor to the primary and collocated R&amp;P 2025 FRM samplers through September 2009. Beginning 10/1/09, the MetOne BAM was designated the primary sampler and an R&amp;P 2025 FRM sampler was retained as the collocated sampler. The 2025 FRM sampler was replaced by a MetOne E-SEQ-FRM 16-channel sequential sampler on 1/1/2020.</li> <li>3. Between 10/28/10 and 1/3/11, the PM<sub>2.5</sub> Met One BAM-1020 was temporarily removed from service while being reconfigured to operate as the PM<sub>2.5</sub> portion of a paired PM<sub>10-2.5</sub> monitoring system. The other part of the paired system is a PM<sub>10</sub> Met One BAM-1020, which is configured to report data in local and STP conditions. The paired units comprising the PM<sub>10-2.5</sub> monitoring system were put on-line on 1/1/11.</li> </ol>			

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**Appendix A: Ambient Air Monitoring Sites in Nebraska**

**Carbon Monoxide Sites in the Omaha MSA Operated by DCHD**

<b>Site Name: 78<sup>th</sup> &amp; Dodge – Omaha</b>		<b>AIRS ID: 31-055-0056</b>	
<b>Location: 78<sup>th</sup> St and W Dodge Rd, Omaha</b>		Latitude: 41.259175°	Longitude: -96.028628°
Operating Agency: Douglas County Health Department			
<b>Monitor Information</b>		<b>Pollutant: Carbon Monoxide (CO)</b>	
Type/POC: Primary / POC 01		Monitoring Frequency: Continuous	
Analyzer/Sampler: Thermo 48c		EPA Method:	
Purpose: Highest Concentration		Scale: Microscale	
Start-Up Date: 10/01/07		Closure Date: Currently operating	
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
Comments: None			

**Combined Sulfur Dioxide & Ozone Site in the Omaha MSA Operated by DCHD**

<b>Site Name: Whitmore – Omaha</b>		<b>AIRS ID: 31-055-0053</b>	
<b>Location: 1616 Whitmore St, Omaha<sup>(1)</sup></b>		Latitude: 41.297778°	Longitude: -95.937500°
Operating Agency: Douglas County Health Department			
<b>Monitor Information</b>		<b>Pollutant: Sulfur Dioxide (SO<sub>2</sub>)</b>	
Type/POC: Primary / POC 01		Monitoring Frequency: Continuous	
Analyzer/Sampler: Thermo 43c-tle		EPA Method: EQSA-0486-060	
Purpose: High Conc. & Population Oriented <sup>(1)</sup>		Scale: Neighborhood <sup>(1)</sup>	
Start-Up Date: 7/1/99		Closure Date: Currently operating*	
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
<b>Monitor Information</b>		<b>Pollutant: Ozone (O<sub>3</sub>)<sup>(2)</sup></b>	
Type/POC: Primary / POC 01		Monitoring Frequency: Continuous	
Analyzer/Sampler: Thermo 49C		EPA Method: EQOA-0880-047	
Purpose: Population Oriented <sup>(1)</sup>		Scale: Neighborhood <sup>(1)</sup>	
Start-Up Date: 4/1/15		Closure Date: Currently operating	
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
Comments:			
(1) This site is in a socioeconomically disadvantaged area.			
(2) The ozone monitor from the 30 <sup>th</sup> & Fort Street site was re-located to this site in 2015.			

**Nebraska 2021 Ambient Air Monitoring Network Plan**

**Appendix A: Ambient Air Monitoring Sites in Nebraska**

**Combined Ozone & PM<sub>10</sub> Site in the Omaha MSA Operated by DCHD**

<b>Site Name: South Omaha – Ozone</b>		AIRS ID: 31-055-0028	
<b>Location: 2411 O Street, Omaha</b>		Latitude: 41.207500°	Longitude: -95.947500°
Operating Agency: Douglas County Health Department			
<b>Monitor Information</b>		<b>Pollutant: Ozone (O<sub>3</sub>)</b>	
Type/POC: Primary / POC 01	Analyzer/Sampler: Thermo 49C	Monitoring Frequency: Continuous	
Purpose: Population Oriented	Start-Up Date: 7/1/78	EPA Method: EQOA-0880-047	
Data used for NAAQS comparison: Yes		Scale: Neighborhood	
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable		Closure Date: Currently operating	
<b>Monitor Information</b>		<b>Pollutant: PM<sub>10</sub></b>	
Type/POC: Primary / POC 01	Analyzer/Sampler: Hi-Vol Filter	Monitoring Frequency: Once every 6 days	
Purpose: Population & Source Oriented	Start-Up Date: 6/1/06 <sup>(1)</sup>	EPA Method: RFPS 1287-063	
Data used for NAAQS comparison: Only when there is no primary data		Scale: Neighborhood	
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable		Closure Date: Currently operating	
Comments:			
(1) The PM <sub>10</sub> sampler was initially set-up as a SPAM at 25 <sup>th</sup> & L Sts and then moved to 2411 O St on 8/22/07.			
(2) In 2020 the landowner at 2411 O Street asked for the site to be removed from the property. Ozone monitoring continued through the end of October 2020, the end of the required monitoring season. The owner has allowed PM <sub>10</sub> monitoring to continue while a new site is found. As of March 2021 a new site has not been located.			

**PM<sub>10</sub> Sites in the Omaha MSA Operated by DCHD**

<b>Site Name: 19<sup>th</sup> &amp; Burt, Omaha</b>		AIRS ID: 31-055-0054	
<b>Location: 723 North 18th Sts, Omaha</b>		Latitude: 41.26664°	Longitude: -95.93940°
Operating Agency: Douglas County Health Department			
<b>Monitor Information</b>		<b>Pollutant: PM<sub>10</sub></b>	
Type/POC: Primary / POC 01	Analyzer/Sampler: Hi-Vol Filter	Monitoring Frequency: Once every 6 days	
Purpose: Population & Source Oriented	Start-Up Date: 6/1/01	EPA Method: RFPS 1287-063	
Data used for NAAQS comparison: Yes		Scale: Middle	
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable		Closure Date: Currently operating	
<b>Monitor Information</b>		<b>Pollutant: PM<sub>10</sub></b>	
Type/POC: Collocated / POC 02	Analyzer/Sampler: Hi-Vol Filter	Monitoring Frequency: Once every 6 days <sup>(1)</sup>	
Purpose: Population & Source Oriented	Start-Up Date: 6/1/01	EPA Method: RFPS 1287-063	
Data used for NAAQS comparison: Only when there is no primary data		Scale: Middle	
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable		Closure Date: Currently operating	
Comments: The 19 <sup>th</sup> & Burt Streets site was originally located at 1909 Burt Streets on the rooftop of a building owned by Creighton University. In 2019 the Douglas County Health Department was notified that the university planned to demolish this building to make way for new construction, but that action postponed. The site was moved on March 10, 2021 one and one-half blocks to the east to the new location at 723 North 19 <sup>th</sup> Streets.			

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Appendix A: Ambient Air Monitoring Sites in Nebraska

PM<sub>2.5</sub> Sites in the Omaha MSA Operated by DCHD

<b>Site Name: Berry Street Omaha</b>		AIRS ID: 31-055-0052	
<b>Location: 9225 Berry Street, Omaha</b>		Latitude: 41.333056°	Longitude: -96.099722°
Operating Agency: Douglas County Health Department			
<b>Monitor Information</b>		<b>Pollutant: PM<sub>2.5</sub></b>	
Type/POC: Primary / POC 01	Monitoring Frequency: Once every 3 days		
Analyzer/Sampler: Thermo 2025 Sequential	EPA Method: RFPS-0498-118		
Purpose: Population & Source Oriented	Scale: Neighborhood		
Start-Up Date: 1/1/99	Closure Date: Currently operating		
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
<b>Monitor Information</b>		<b>Pollutant: PM<sub>2.5</sub></b>	
Type/POC: Collocated / POC 02	Monitoring Frequency: Once every 6 days		
Analyzer/Sampler: R&P/Thermo 2025 Sequential	EPA Method: RFPS-0498-118		
Purpose: Population & Source Oriented	Scale: Neighborhood		
Start-Up Date: 10/1/14	Closure Date: Currently operating		
Data used for NAAQS comparison: Only when there is no primary data			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
Comments: None			

<b>Site Name: Bellevue</b>		AIRS ID: 31-153-0007	
<b>Location: 2912 Coffey Ave., Bellevue</b>		Latitude: 41.166944°	Longitude: -95.923889°
Operating Agency: Douglas County Health Department			
<b>Monitor Information</b>		<b>Pollutant: PM<sub>2.5</sub></b>	
Type/POC: Primary Continuous / POC 01	Monitoring Frequency: Continuous		
Analyzer/Sampler: Met One BAM-1020 <sup>(1)</sup>	EPA Method: EQPM-0308-170		
Purpose: Population & Source Oriented	Scale: Neighborhood		
Start-Up Date: 3/1/99	Closure Date: Currently operating		
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
Comments: (1) This site was operated with a 2025 sequential sampler from 3/1/99 thru 6/30/10 (RFPS-0498-118). On 7/1/10 a Met One BAM monitor began operating.			

<b>Site Name: Blair</b>		AIRS ID: 31-177-0002	
<b>Location: 2242 Wright St., Blair</b>		Latitude: 41.551136°	Longitude: -96.146753
Operating Agency: Douglas County Health Department			
<b>Monitor Information</b>		<b>Pollutant: PM<sub>2.5</sub></b>	
Type/POC: Primary / POC 01	Monitoring Frequency: Once every 3 days		
Analyzer/Sampler: R&P/Thermo 2025 Sequential	EPA Method: RFPS-0498-118		
Purpose: Population & Source Oriented	Scale: Neighborhood		
Start-Up Date: 4/6/09	Closure Date: Currently operating		
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
Comments: None			

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**Appendix A: Ambient Air Monitoring Sites in Nebraska**

**Permanently Closed <sup>(1)</sup> Sulfur Dioxide Site in the Omaha MSA Operated by DCHD**

<b>Site Name: OPPD North Omaha Station</b>		AIRS ID: 31-055-0057	
<b>Location: 7288 John Pershing Drive</b>		Latitude: 41.325579°	Longitude: -95.946297°
Operating Agency: Douglas County Health Department			
<b>Monitor Information</b>		<b>Pollutant: Sulfur Dioxide (SO<sub>2</sub>)</b>	
Type/POC: Primary / POC 01		Monitoring Frequency: Continuous	
Analyzer/Sampler: Thermo 43i		EPA Method: EQSA-0486-060	
Purpose: Population & Source Oriented		Scale: Microscale	
Start-Up Date: 01/01/17		Closure Date: 12/31/2020	
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, Appendix B not applicable			
Comments:			
(1) This site was established to satisfy requirements of the Data Requirements Rule (DRR) in 40 CFR Part 51 to characterize air quality near the Omaha Public Power District North Omaha Station coal-fired power plant. The SO <sub>2</sub> Design Value after three years of monitoring (2017-2020) was below the threshold that would require continued monitoring under the DRR. As a result, EPA approved closure of the site at the end of 2020.			

**PM<sub>10</sub> Site in the Weeping Water Area\* Operated by NDEE**

\* The Weeping Water Area is in Cass County, which is part of the Omaha MSA. This is a relatively non-urbanized area of the county with limestone mining and processing activities. The PM<sub>10</sub> monitoring conducted here is for evaluation of air quality in the vicinity of Weeping Water, and not the Omaha MSA as a whole.

<b>Site Name: Weeping Water City <sup>(1)</sup></b>		AIRS ID: 31-025-0002	
<b>Location: 102 P Street, Weeping Water</b>		Latitude: 40.866228	Longitude: -96.137678
Operating Agency: Nebraska Department of Environment and Energy			
<b>Monitor Information</b>		<b>Pollutant: PM<sub>10</sub></b>	
Type/POC: Primary / POC 01		Monitoring Frequency: Continuous	
Analyzer/Sampler: Met One BAM <sup>(2)</sup>		EPA Method: EQPM-0798-170	
Purpose: Population & Source Oriented		Scale: Neighborhood	
Start-Up Date: 01/01/85		Closure Date: Currently operating	
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes. See Section V.A.1.a. App B not applicable			
Comments:			
(1) Site is located at the city wastewater treatment facility.			
(2) This site was operated with a primary 2025 sequential monitor from 8/12/2004 to 9/30/2016. A MetOne BAM continuous monitor began operating on 10/1/2016. A collocated 2025 sequential monitor at the site suffered a major electronic breakdown and last sampled on 3/25/15. With the installation of the continuous monitor, collocation is no longer required.			

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Appendix A: Ambient Air Monitoring Sites in Nebraska

Sites in the Lincoln MSA Operated by LLCHD

<b>Site Name: Davey</b>		AIRS ID: 31-109-0016	
<b>Location: 1<sup>st</sup> &amp; Maple Sts., Davey</b>		Latitude: 40.984722°	Longitude: -96.677222°
Operating Agency: Lincoln Lancaster County Health Department			
<b>Monitor Information</b>		<b>Pollutant: Ozone</b>	
Type/POC: Primary / POC 01		Monitoring Frequency: Continuous	
Analyzer/Sampler: Teledyne API 400E		EPA Method: EQOA-0992-087	
Purpose: Population Oriented		Scale: Urban	
Start-Up Date: 1/1/85		Closure Date: Currently operating	
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
Comments: This site was upgraded at the beginning of the 2014 ozone season with the Teledyne API 400E analyzer replacing the Dasibi 1003 AH analyzer.			
<b>Site Name: LLCHD Building</b>		AIRS ID: 31-109-0022	
<b>Location: 3140 N St., Lincoln</b>		Latitude: 40.812590°	Longitude: -96.683020°
Operating Agency: Lincoln Lancaster County Health Department			
<b>Monitor Information</b>		<b>Pollutant: PM<sub>2.5</sub></b>	
Type/POC: Primary / POC 01		Monitoring Frequency: Once every 3 days	
Analyzer/Sampler: R&P 2025 Seq. Filter		EPA Method: RFPS 0498-118	
Purpose: Population Oriented		Scale: Neighborhood	
Start-Up Date: 1/1/99		Closure Date: Currently operating	
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
<b>Monitor Information</b>		<b>Pollutant: PM<sub>2.5</sub></b>	
Type/POC: Collocated / POC 02		Monitoring Frequency: Once every 6 days	
Analyzer/Sampler: R&P 2025 Seq. Filter		EPA Method: RFPS 0498-118	
Purpose: Population Oriented		Scale: Neighborhood	
Start-Up Date: 1/1/99		Closure Date: Currently operating	
Data used for NAAQS comparison: Only when primary data is not available.			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
<b>Monitor Information</b>		<b>Pollutant: PM<sub>2.5</sub></b>	
Type/POC: Continuous / POC 03 <sup>(1)</sup>		Monitoring Frequency: Continuous	
Analyzer/Sampler: Met One BAM-1020		EPA Method: EQPM-0308-170	
Purpose: Population Oriented		Scale: Neighborhood	
Start-Up Date: 7/1/06		Closure Date: Currently operating	
Data used for NAAQS comparison: No. Reports to AirNow, but not AQS <sup>(1)</sup>			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
Comment:			
(1) The MetOne BAM monitor reported data to AirNow , but not AQS. Data from the MetOne BAM is not used for NAAQS comparison. The MetOne BAM data typically demonstrates a positive bias when compared to same day FRM data. In 2015, there was a 39% bias on same-day annual average data, and a 17% positive bias for the same-day 98 <sup>th</sup> percentile.			

Nebraska 2021 Ambient Air Monitoring Network Plan

Appendix A: Ambient Air Monitoring Sites in Nebraska

Permanently Closed <sup>(1)</sup> Sulfur Dioxide Site in the Lincoln MSA

Operated by LLCHD

<b>Site Name: Sheldon Station</b>	AIRS ID: 31-109-0025
<b>Location: SW 42<sup>nd</sup> St ~0.2 mi N of W Pella Rd</b>	Latitude: 40.554722° Longitude: -96.780278°
Operating Agency: Lincoln-Lancaster County Health Department	
<b>Monitor Information</b>	<b>Pollutant: Sulfur Dioxide (SO<sub>2</sub>)</b>
Type/POC: Primary / POC 01	Monitoring Frequency: Continuous
Analyzer/Sampler: Teledyne API T100	EPA Method: EQSA-0495-100
Purpose: Highest Concentration	Scale: Microscale
Start-Up Date: 12/23/16	Closure Date: 12/31/2020
Data used for NAAQS comparison: Yes	
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable	
Comments: This site was established to satisfy requirements of the Data Requirements Rule (DRR) in 40 CFR Part 51 to characterize air quality near the Nebraska Public Power District Sheldon Station coal-fired power plant. The SO <sub>2</sub> Design Value after three years of monitoring (2017-2020) was below the threshold that would require continued monitoring under the DRR. As a result, EPA approved closure of the site at the end of 2020.	

Permanently Closed PM<sub>2.5</sub> Sites Operated by NDEE

<b>Site Name: Grand Island Senior High</b>	AIRS ID: 31-079-0004
<b>Location: 2124 N Lafayette Ave, Grand Island</b>	Latitude: 40.942099° Longitude: -98.364967°
Operating Agency: Nebraska Department of Environment and Energy	
<b>Monitor Information</b>	<b>Pollutant: PM<sub>2.5</sub></b>
Type/POC: Primary FRM/ POC 01	Monitoring Frequency: Once every 3 days
Analyzer/Sampler: R&P 2025 Sequential	EPA Method: RFPS-0498-118
Purpose: Transport & Population Oriented	Scale: Regional & Neighborhood
Start-Up Date: 5/7/04	Closure Date: 3/31/20
Data used for NAAQS comparison: Yes	
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable	
Comments: Site superseded by site 31-079-0005 in Grand Island.	

<b>Site Name: Scottsbluff Senior High School</b>	AIRS ID: 31-157-0004
<b>Location: Hwy 26 &amp; 5<sup>th</sup> Ave, Scottsbluff <sup>(1)</sup></b>	Latitude: 41.87609° Longitude: -103.6587°
Operating Agency: Nebraska Department of Environment and Energy	
<b>Monitor Information</b>	<b>Pollutant: PM<sub>2.5</sub></b>
Type/POC: Primary FRM/ POC 01	Monitoring Frequency: Once every 3 days
Analyzer/Sampler: Thermo 2025i Sequential	EPA Method: RFPS-0498-118
Purpose: Background & Population Oriented	Scale: Regional & Neighborhood
Start-Up Date: 5/13/09	Closure Date: 3/23/2020
Data used for NAAQS comparison: Yes	
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable	
Comments: (1) The previous sampler was moved ~170 m W-SW on 4/15/16 (1 <sup>st</sup> sample date at new location). The move was necessitated by re-construction of athletic fields and at the request of the school. The site ID # was retained at that time.	



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**Appendix A: Ambient Air Monitoring Sites in Nebraska**

**PM<sub>2.5</sub> Sites Operated by NDEE**

<b>Site Name: Grand Island NDOT</b>		<b>AIRS ID: 31-079-0005</b>	
<b>Location: 3305 W Old Potash Hwy, Grand Island</b>		Latitude: 40.918333°	Longitude: -98.378889°
Operating Agency: Nebraska Department of Environment and Energy			
<b>Monitor Information</b>		<b>Pollutant: PM<sub>2.5</sub></b>	
Type/POC: Primary Continuous/ POC 01	Analyzer/Sampler: Met One BAM-1020	Monitoring Frequency: Continuous	EPA Method: EQPM-0308-170
Purpose: Background Surveillance	Start-Up Date: 11/26/19	Scale: Regional	Closure Date: Currently operating
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
Comments: None			

<b>Site Name: Scottsbluff Senior High School</b>		<b>AIRS ID: 31-157-0006</b>	
<b>Location: Hwy 26 &amp; 5<sup>th</sup> Ave, Scottsbluff <sup>(1)</sup></b>		Latitude: 41.875556°	Longitude: -103.658056°
Operating Agency: Nebraska Department of Environment and Energy			
<b>Monitor Information</b>		<b>Pollutant: PM<sub>2.5</sub></b>	
Type/POC: Primary Continuous/ POC 01	Analyzer/Sampler: Met One BAM-1020	Monitoring Frequency: Continuous	EPA Method: EQPM-0308-170
Purpose: Background & Population Oriented	Start-Up Date: 3/24/20	Scale: Regional & Neighborhood	Closure Date: Currently operating
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
Comments:			
(1) A Thermo 2025i FRM Sequential sampler operated at this location on a 3-day sampling schedule with the AIRS ID 31-157-0004 until 3/24/20, when a continuous sampler was installed at the same location and a new AIRS ID was assigned.			

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**Appendix A: Ambient Air Monitoring Sites in Nebraska**

**Temporarily Closed Source-Oriented Lead (Pb) Site Operated by NDEE**

<b>Site Name: Fremont</b>		AIRS ID: 31-053-0005	
<b>Location: 1255 Front St., Fremont, NE</b>		Latitude: 41.90583°	Longitude: -97.31583°
Operating Agency: Nebraska Department of Environmental Quality			
<b>Monitor Information</b>		<b>Pollutant: Lead (Pb)</b>	
Type/POC: Primary / POC 01		Monitoring Frequency: Once every 6 days	
Analyzer/Sampler: Hi-Vol TSP-Pb (ICP-MS)		EPA Method: EQL-0310-189	
Purpose: Source-Oriented <sup>(1)</sup>		Scale: Micro-scale	
Start-Up Date: 3/9/10		Closure Date: Currently operating	
Data used for NAAQS comparison: Yes			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
<b>Monitor Information</b>		<b>Pollutant: Lead (Pb)</b>	
Type/POC: Collocated / POC 02		Monitoring Frequency: Once every 6 days	
Analyzer/Sampler: Hi-Vol TSP-Pb (ICP-MS)		EPA Method: EQL-0310-189	
Purpose: Source Oriented		Scale: Micro-scale	
Start-Up Date: 3/9/10		Closure Date: 9/31/2018	
Data used for NAAQS comparison: Only if primary sampler data is not available			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Yes, App B not applicable			
<b>Comments:</b>			
(1) Source-oriented with respect to Magnus Farley. Site closed at the request of the landowner. A nearby alternative site has been approved and a site agreement is being negotiated.			

**Source-Oriented Lead Monitoring Waivers pursuant to 40 CFR Part 58 Section 4.5(ii)**

**(1) Nucor Steel in Norfolk, NE:** Waiver first approved by the EPA R7 Administrator in April 2014 and effective through April 2019. Renewal of this waiver was requested in the Nebraska 2019 Network Plan, which was approved by the EPA R7 Administrator in October 2019. The waiver will remain in effect until April 2024.

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**Appendix A: Ambient Air Monitoring Sites in Nebraska**

**Interagency Monitoring of Protected Visual Environments (IMPROVE) Sites \***

\* Interagency Monitoring of Protected Visual Environments (IMPROVE) monitors are operated to evaluate regional haze that may impact Federal Class I areas in National Parks and Wilderness Areas. Fine particulate and particulate speciation monitoring is conducted at these sites. They do not have an AIRS ID, are not subject to 40 CFR Part 58 requirements, and are not used for NAAQS attainment determinations.

<b>Site Name: NE National Forest IMPROVE</b>		<b>AIRS ID: Not applicable, See Comments</b>	
<b>Location: Nebraska National Forest, Thomas Co.</b>		Latitude: 41.8888°	Longitude: -100.3387°
Operating Agency: Nebraska Department of Environment and Energy / US Forest Service			
<b>Monitor Information</b>		<b>Pollutant: IMPROVE (See Comments)</b>	
Type/POC: IMPROVE		Monitoring Frequency: Continuous	
Method Description: : IMPROVE		EPA Method: Not applicable	
Purpose: Background & Transport		Scale: Regional	
Start-Up Date: 2002		Closure Date: Currently operating	
Data used for NAAQS comparison: Not applicable.			
Meets applicable provisions of 40 CFR Part 58 Appendixes A thru E: Not applicable			
Comments: None			

**National Atmospheric Deposition Program (NADP) Sites\*\***

\*\* The NADP site information below is included in the Network Plan for informational purposes only. They are not subject to 40 CFR Part 58 requirements, nor used for NAAQS attainment determinations.

<b>Site Name: Mead NADP</b>		<b>AIRS ID: Not applicable, See Comments</b>	
<b>Location: U of NE Field Lab, Saunders Co.</b>		Latitude: 41.1528°	Longitude: -96.4912
Operating Agency: University of Nebraska			
<b>Monitor Information</b>		<b>Pollutant: TNT/MDN</b>	
Type/POC: NTN/MDN		Monitoring Frequency: Continuous	
Method Description: NTN/MDN		EPA Method: Not applicable	
Purpose: Background & Transport		Scale: Regional	
Start-Up Date: 7/25/78		Closure Date: Currently operating	
<p>Comments: The Mead and North Platte National Atmospheric Deposition Program (NADP) sites are operated by the University of Nebraska with analytical and data processing support from the NADP. NADP sites are not subject to review under the provisions of 40 CFR Part 58.10, and thus are not subject to review under this Network Plan. They are included herein for informational purposes only.</p> <ul style="list-style-type: none"> <li>• Monitoring methods are specific to this program and are not Federal Reference or Equivalent Methods (FRM/FEM).</li> <li>• The National Trends Network (NTN) sites collect deposition data on acidity, sulfate, nitrate, ammonium, chloride, and base cations (e.g., calcium, magnesium, potassium, and sodium).</li> <li>• Mercury Deposition Network (MDN) sites collect mercury deposition data.</li> <li>• The NADP oversees both NTN and MDN sites and provides analytical and data processing support.</li> <li>• The Mead site began operation as an NTN site in 1978 and began MDN operations in June 2007. NDEE provides financial support for MDN operations at this site through Title V fees.</li> </ul>			

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**Appendix A: Ambient Air Monitoring Sites in Nebraska**

**National Atmospheric Deposition Program (NADP) Sites (continued)**

<b>Site Name: North Platte NADP</b>		AIRS ID: Not applicable, See Comments	
<b>Location: U of Ne Ag Station, Lincoln, Co.</b>		Latitude: 41.0592°	Longitude: -100.7464°
Operating Agency: University of Nebraska			
<b>Monitor Information</b>		<b>Pollutant: NTN</b>	
Type/POC: NTN		Monitoring Frequency: Continuous	
Method Description: NTN		EPA Method: Not applicable	
Purpose: Background & Transport		Scale: Regional	
Start-Up Date: 9/24/85		Closure Date: Currently operating	
<p>Comments: The Mead and North Platte National Atmospheric Deposition Program (NADP) sites are operated by the University of Nebraska with analytical and data processing support from the NADP. NADP sites are not subject to review under the provisions of 40 CFR Part 58.10, and thus are not subject to review under this Network Plan. They are included herein for informational purposes only.</p> <ul style="list-style-type: none"> <li>• Monitoring methods are specific to this program and are not Federal Reference or Equivalent Methods (FRM/FEM).</li> <li>• The National Trends Network (NTN) sites collect deposition data on acidity, sulfate, nitrate, ammonium, chloride, and base cations (e.g., calcium, magnesium, potassium, and sodium).</li> <li>• Mercury Deposition Network (MDN) data was collected at this site from October 2009 thru October 2011 using Nebraska Environmental Trust funding.</li> <li>• The NADP oversees both NTN and MDN sites and provides analytical and data processing support.</li> </ul>			

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**Appendix B: Comparison of Ambient Air Monitoring Data to NAAQS**

This appendix compares ambient air quality data from 2018 through 2020 to the NAAQS. The annual data and estimated Design Values (DVs) presented below were retrieved from the EPA AQS database.

**Table B-1: Ozone Data**

<b>Comparison of 3-Year Design Values for 8-hour Ozone to NAAQS<sup>(1)</sup></b>						
<b>Site</b>	<b>Operator</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>DV</b>	<b>% NAAQS</b>
<b>Omaha MSA and Near-By Montgomery Co., IA<sup>(4)</sup></b>						
<b>Omaha NCore</b>	DCHD	0.069	0.061	0.058	0.062	89%
<b>2411 O St., Omaha</b>	DCHD	0.063	0.050	0.055	0.056	80%
<b>1616 Whitmore St, Omaha</b>	DCHD	0.066	0.062	0.052	0.060	86%
<b>Pisgah, Harrison Co., IA</b>	IA DNR	0.066	0.062	0.061	0.063	90%
<b>Montgomery County, IA<sup>(2)</sup></b>	IA DNR	0.064	0.059	0.056	0.059	84%
<b>Lincoln MSA</b>						
<b>First &amp; Maple, Davey</b>	LLCHD	0.062	0.056	0.054	0.057	81%
<b>Sioux City MSA</b>						
<b>31986 475<sup>th</sup> Ave, Union Co, SD</b>	SD DEP	0.068	0.064	0.063	0.065	94%
<b>Nebraska Non-MSA</b>						
<b>Santee Indian Reservation</b>	US EPA	0.065	0.062	0.063	0.063	90%
<b>Sites in Surrounding States</b>						
<b>Emmetsburg, IA</b>	IA DNR	0.067	0.065	0.062	0.064	91%
<b>Des Moines, IA</b>	IA DMR	0.065	0.059	0.057	0.060	86%
<b>Savannah, MO</b>	MO DNR	0.067	0.060	0.059	0.062	89%
<b>Kansas City Metro (Max DV site)</b>	MO DNR	0.072	0.062	0.065	0.066	94%
<b>Topeka KS</b>	KS DHE	0.062	0.061	0.057	0.060	86%
<b>Cedar Bluff Reservoir, KS</b>	KS DHE	0.064	0.058	0.059	0.060	86%
<b>Denver, CO Metro (Max DV site)</b>	CO DPHE	0.083	0.078	0.083	0.081	116%
<b>Greeley, CO</b>	CO DPHE	0.073	0.065	0.072	0.070	100%
<b>Cheyenne, WY (Max DV site)</b>	WY DEQ	0.068	0.059	0.060	0.062	89%
<b>Newcastle, WY</b>	WY BLM	0.063	0.059	0.066	0.062	89%
<b>Sioux Falls, SD</b>	SD DEP	0.069	0.065	0.064	0.066	94%
<b>Wind Cave NP, Custer Co., SD</b>	SD DEP	0.063	0.057	0.063	0.061	87%
<b>Badlands NP, Jackson Co., SD</b>	SD DEP	0.063	0.058	0.061	0.060	86%
Notes and Explanations:						
(1) EPA AQS data retrieval 4/2/21. Concentrations are in units of ppm. Annual values are the 4 <sup>th</sup> highest daily maximum 8-hour concentrations (ppm). The Design Value (DV) is the truncated 3-year average of the 4 <sup>th</sup> highest max for each year. The NAAQS = 0.070 ppm (promulgated 10/1/2015).						
(2) The Montgomery County, IA site is located outside the Omaha MSA at Viking Lake State Park; ~18 miles east of the Mills-Montgomery County line and ~ 45 miles SE of the I-29/I-80 intersection.						

Nebraska 2021 Ambient Air Monitoring Network Plan

Appendix B: Comparison of Ambient Air Monitoring Data to NAAQS

Table B-2: Carbon Monoxide Data

Comparison of 3-Year Maximum Value for 1-Hour Carbon Monoxide to NAAQS <sup>(1) (2)</sup>					
Site	2018	2019	2020	Design Value <sup>(2)</sup>	% NAAQS
<b>Omaha MSA</b>					
<b>78<sup>th</sup> &amp; Dodge Streets, Omaha</b>	1.7	1.9	1.8	1.9	5%
<b>Omaha NCore <sup>(4)</sup></b>	1.01	0.95	0.85	1.01	3%
Comparison of 3-Year Maximum Value for 8-Hour Carbon Monoxide to NAAQS <sup>(1) (3)</sup>					
Site	2018	2019	2020	Design Value <sup>(3)</sup>	% NAAQS
<b>Omaha MSA</b>					
<b>78<sup>th</sup> &amp; Dodge Streets, Omaha</b>	1.3	1.6	1.6	1.6	18%
<b>Omaha NCore <sup>(4)</sup></b>	0.7	0.6	0.5	0.7	8%
Notes and Explanations:					
(1) EPA AQS data retrieval 3/3/21. The CO NAAQS were last revised in 1984. The latest review was concluded in August 2011 when EPA determined no changes in the CO NAAQS were warranted.					
(2) The 1-hour NAAQS = 35 ppm. The Design Value is the highest annual 2 <sup>nd</sup> highest maximum value over the last 3 years. The annual values shown are the annual 2 <sup>nd</sup> highest maximum values. Concentrations are in units of ppm.					
(3) The 8-hour NAAQS = 9 ppm. The Design Value is the highest annual 2 <sup>nd</sup> highest maximum value over the last 3 years. The annual values shown are the 2 <sup>nd</sup> highest 8-hour maximum values. Concentrations are in units of ppm.					
(4) Omaha NCore is a multi-pollutant monitoring site located at 4102 Woolworth Street.					

**Nebraska 2021 Ambient Air Monitoring Network Plan**  
**Appendix B: Comparison of Ambient Air Monitoring Data to NAAQS**

**Table B-3: Sulfur Dioxide Data**

<b>Comparison of Daily Maximum 1-Hour Sulfur Dioxide Levels to the Primary NAAQS <sup>(1)</sup></b>					
<b>Site</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>Design Value <sup>(1)</sup></b>	<b>% NAAQS</b>
<b>Omaha MSA</b>					
<b>1616 Whitmore St., Omaha</b>	0.029	0.038	0.034	0.034	45%
<b>Omaha NCore <sup>(2)</sup></b>	0.017	0.009	0.008	0.011	15%
<b>7288 John Pershing Dr., Omaha <sup>(3)</sup></b>	0.037	0.029	0.044	0.036	48%
<b>Lincoln MSA</b>					
<b>SW 42<sup>nd</sup> St., Lancaster Co. <sup>(4)</sup></b>	0.010	0.033	0.025	0.023	30%
<b>Sioux City MSA Sites</b>					
<b>31986 475<sup>th</sup> Ave, Union Co, SD <sup>(5)</sup></b>	0.003	0.003	0.002	0.003	4%
Notes and Explanations:					
(1) EPA AQS data retrieval 4/2/21. The 1-hour NAAQS is 75 ppb or 0.075 ppm (promulgated in June 2010 and retained in December 2020). The annual values shown are the 99 <sup>th</sup> percentile of the daily maximum values in ppm units. The Design Value is the three-year average of the annual 99 <sup>th</sup> percentile daily maximum values.					
(2) Omaha NCore is a multi-pollutant monitoring site located at 4102 Woolworth Street.					
(3) The 7288 John Pershing Dr. site began operation on 01/01/17 and was operated by DCHD. This site adjacent to the OPPD North Omaha Generating Station was established to satisfy the requirements of the Data Requirements Rule (DRR) in 40 CFR Part 51. These requirements being satisfied after three years of data collection, the site was closed on 12/31/2020.					
(4) The SW 42 <sup>nd</sup> St., Lancaster County site began operation on 12/23/16 and was operated by LLCHD. This site adjacent to the NPPD Sheldon Generating Station was established to satisfy the requirements of the Data Requirements Rule (DRR) in 40 CFR Part 51. These requirements being satisfied after three years of data collection, the site was closed on 12/31/2020.					
(5) The Union Co., SD site is operated by the South Dakota Department of Environment & Natural Resources.					

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Appendix B: Comparison of Ambient Air Monitoring Data to NAAQS

Table B-4a: Nitrogen Dioxide Data

Comparison of 1-Hour Maximum Levels of Nitrogen Dioxide to NAAQS <sup>(1)(2)</sup>					
Site	2018	2019	2020	Design Value <sup>(2)</sup>	% NAAQS
<b>Sioux City MSA</b>					
<b>31986 475<sup>th</sup> Ave, Union Co, SD <sup>(4)</sup></b>	0.018	0.012	0.022	0.017	17%
Comparison of 3-Year Maximum Annual Average Value for Nitrogen Dioxide to NAAQS <sup>(3)</sup>					
Site	2018	2019	2020	Design Value <sup>(3)</sup>	% NAAQS
<b>Sioux City MSA</b>					
<b>31986 475<sup>th</sup> Ave, Union Co, SD <sup>(4)</sup></b>	0.002	0.002	0.002	0.002	3%
Notes and Explanations:					
(1) EPA AQS data retrieval 4/20/21. All concentrations expressed in ppm units.					
(2) The 1-hour NO <sub>2</sub> NAAQS is 0.100 ppm (promulgated Feb. 2010 and retained Apr. 2018). NAAQS attainment is achieved if the 3-year average of the annual 98th percentile of the daily maximum 1-hour values does not exceed 0.100 ppm.					
(3) The Annual Average NO <sub>2</sub> NAAQS is 0.053 ppm not to be exceeded in a calendar year. It was promulgated 1971 and retained in the 1996 and 2010 reviews. The Design Value is the highest annual average over the 3-year comparison period.					
(4) The Union County SD site is operated by the South Dakota Department of Environment & Natural Resources.					

Table B-4b: Nitrogen Oxide Data from the Omaha NCore Site <sup>(1)(2)</sup>

Parameter	2018	2019	2020	Approx. DV <sup>(3)</sup>	Max % NAAQS
<b>1-Hour Data: 98<sup>th</sup> Percentile</b>					
<b>NOy-NO <sup>(3)(4)(5)</sup></b>	0.038	0.040	0.035	0.038	38%
<b>Annual Average Data</b>					
<b>NOy-NO</b>	0.0060	0.0058	0.0058	0.0045	10%
Footnotes:					
(1) EPA AQS data retrieval 3/8/21. All concentrations expressed in ppm units.					
(2) Omaha NCore is a multi-pollutant monitoring site located at 4102 Woolworth Street.					
(3) NOy – Reactive oxides of nitrogen, which include NO, NO <sub>2</sub> and other nitrogen oxides, including organic nitrogen oxide compounds.					
(4) NO – Nitrogen oxide					
(5) NOy-NO provides an approximation of nitrogen dioxide (NO <sub>2</sub> ), with some possibility of over-estimating the true NO <sub>2</sub> concentration. For this reason, the NOy-NO parameter can be used to demonstrate attainment, but not non-attainment.					



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**Appendix B: Comparison of Ambient Air Monitoring Data to NAAQS**

**Table B-5a: PM<sub>10</sub> – Annual Number of Exceedances<sup>(1) (2)</sup>**

Site	2018	2019	2020	Design Value <sup>(1)</sup>
<b>Omaha MSA Sites<sup>(6)</sup></b>				
<b>Omaha NCore, 4102 Woolworth St.<sup>(3)</sup></b>	0	0	0	0.0
<b>2411 O St, Omaha</b>	0	0	0	0.0
<b>19th &amp; Burt Streets, Omaha</b>	0	0	0	0.0
<b>3130 C Ave, Council Bluffs, IA<sup>(4)</sup></b>	0	0	0	0.0
<b>Weeping Water City<sup>(5)</sup></b>	0	0	0	0.0
<b>Sioux City MSA Site</b>				
<b>31986 475<sup>th</sup> Ave, Union Co, SD<sup>(6)</sup></b>	0	0	0	0.0
<p>Notes and Explanations:</p> <p>(1) EPA AQS data retrieval 4/20/21. The PM<sub>10</sub> NAAQS is an exceedance-based standard with a 24-hour averaging time and 150 µg/m<sup>3</sup> level at standard temperature (25° C) and pressure (760 mm Hg) conditions. This standard is not to be exceeded more than once per year on average over 3 years, where exceedance is defined as a value of 155 µg/m<sup>3</sup> or more. Sites with 3-year average of exceedances of 1.0 or less are in attainment with the NAAQS.</p> <p>(2) NAAQS History: The primary 24-hour NAAQS was initially set at 150 µg/m<sup>3</sup> in 1987 and was retained at this level in the 1997, 2006 and 2012 PM NAAQS reviews.</p> <p>(3) Omaha NCore is a multi-pollutant monitoring site located at 4102 Woolworth Street.</p> <p>(4) The Council Bluffs, IA site is operated by the IA DNR</p> <p>(5) Weeping Water is a limestone mining and processing area in Cass County, which is located 15 to 20 miles south of the main urbanized area within the Omaha MSA.</p> <p>(6) The Union Co., SD site is operated by the South Dakota Department of Environment &amp; Natural Resources</p>				

**Nebraska 2021 Ambient Air Monitoring Network Plan**  
**Appendix B: Comparison of Ambient Air Monitoring Data to NAAQS**

**Table B-5b: PM<sub>10</sub> – Annual Maximum 24-Hour Data** <sup>(1) (2)</sup>

Site	2018	2019	2020	4 <sup>th</sup> Highest Value <sup>(1)</sup>	% NAAQS
<b>Omaha MSA Sites <sup>(6)</sup></b>					
<b>Omaha NCore, 4102 Woolworth St. <sup>(3)</sup></b>	64	52	71	66	44%
<b>2411 O St, Omaha</b>	55	43	83	55	37%
<b>19th &amp; Burt Streets, Omaha</b>	51	40	84	44	29%
<b>3130 C Ave, Council Bluffs, IA <sup>(4)</sup></b>	83	48	95	60	40%
<b>Weeping Water City <sup>(5)</sup></b>	67	50	95	71	47%
<b>Sioux City MSA Site</b>					
<b>31986 475<sup>th</sup> Ave, Union Co, SD <sup>(6)</sup></b>	131	56	94	94	63%
<p>Notes and Explanations:</p> <p>(1) EPA AQS data retrieval 4/20/21. Year columns show annual maximum 24-hour average values of PM<sub>10</sub>. NAAQS = 150 µg/m<sup>3</sup>, not to be exceeded more than once per year on average over 3 years, where exceedance is defined as a value of 155 µg/m<sup>3</sup> or more. Annual values that do not meet completeness requirements are shown in red. The 4<sup>th</sup>-highest 24-hour average value in the three-year period is shown for informal comparison to the NAAQS.</p> <p>(2) NAAQS History: The primary 24-hour NAAQS was initially set at 150 µg/m<sup>3</sup> in 1987, and was retained at this level in the 1997, 2006 and 2012 PM NAAQS reviews.</p> <p>(3) Omaha NCore is a multi-pollutant monitoring site located at 4102 Woolworth Street.</p> <p>(4) The Council Bluffs, IA site is operated by the IA DNR</p> <p>(5) Weeping Water is a limestone mining and processing area in Cass County, which is located 15 to 20 miles south of the main urbanized area within the Omaha MSA.</p> <p>(6) The Union Co., SD site is operated by the South Dakota Department of Environment &amp; Natural Resources</p>					

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**Appendix B: Comparison of Ambient Air Monitoring Data to NAAQS**

**Table B-5c: PM<sub>10</sub> - Annual Average Data <sup>(1)</sup>**

Site	2018	2019	2020	3-Year Average	% Old Std
<b>Omaha MSA <sup>(4)</sup></b>					
<b>Omaha NCore, 4102 Woolworth St. <sup>(2)</sup></b>	18.6	17.7	20.6	19.0	38%
<b>2411 O St, Omaha</b>	23.1	20.7	23.8	22.5	45%
<b>19th &amp; Burt Streets, Omaha</b>	20.9	18.8	21.7	20.5	41%
<b>3130 C Ave, Council Bluffs, IA <sup>(3)</sup></b>	21.5	19.0	22.0	20.8	42%
<b>Weeping Water City <sup>(4)</sup></b>	17.3	15.7	18.7	17.2	34%
<b>Sioux City MSA</b>					
<b>31986 475<sup>th</sup> Ave, Union Co, SD <sup>(5)</sup></b>	18.2	15.2	19.4	17.6	35%
Notes and Explanations:					
<p>(1) EPA AQS data retrieval 4/20/21. There is currently no NAAQS for the annual average PM<sub>10</sub> concentration. An annual average NAAQS of 50 µg/m<sup>3</sup> was established in 1987, and then rescinded on December 18, 2006. Annual values and average values that do not meet completeness requirements are shown in red. Comparison to the rescinded NAAQS is provided for informational purposes only. Concentrations are in units of µg/m<sup>3</sup>.</p> <p>(2) Omaha NCore is a multi-pollutant monitoring site located at 4102 Woolworth Street.</p> <p>(3) The Council Bluffs IA site is operated by the IA DNR</p> <p>(4) Weeping Water is a limestone mining and processing area in Cass County, which is located 15 to 20 miles south of the main urbanized area within the Omaha MSA.</p> <p>(5) The Union Co., SD site is operated by the South Dakota Department of Environment &amp; Natural Resources.</p>					

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**Table B-6a: PM<sub>2.5</sub> - 98<sup>th</sup> Percentile 24-Hour Data** <sup>(1) (2)</sup>

Site	2018	2019	2020	Design Value <sup>(1)</sup>	% NAAQS
<b>Omaha MSA &amp; Montgomery Co., IA <sup>(5)</sup></b>					
<b>Omaha NCore <sup>(3)</sup></b>	19.5	17.0	17.3	17.9	51%
<b>9225 Berry St.; Omaha</b>	22.0	18.5	17.7	19.4	55%
<b>2912 Coffey Ave., Bellevue</b>	21.2	21.5	17.3	20.0	57%
<b>2242 Wright St., Blair</b>	20.8	17.9	16.3	18.3	52%
<b>3130 C Ave., Council Bluffs, IA <sup>(4)</sup></b>	22.0	17.7	21.8	20.5	59%
<b>Montgomery Co., IA (outside Omaha MSA) <sup>(4) (5)</sup></b>	18.5	15.2	14.8	16.2	46%
<b>Lincoln MSA</b>					
<b>3140 N Street, Lincoln</b>	19.2	16.6	16.5	17.4	50%
<b>Sioux City MSA</b>					
<b>901 Floyd Blvd, Sioux City, IA <sup>(4)</sup></b>	20.0	22.3	20.9	21.1	60%
<b>31986 475th Ave, Union Co, SD <sup>(6)</sup></b>	15.5	16.5	16.9	16.3	47%
<b>Other Nebraska Sites</b>					
<b>Grand Island <sup>(7)</sup></b>	18.6	16.1	18.5	17.7	50%
<b>Scottsbluff <sup>(8)</sup></b>	17.6	12.3	25.8	18.6	53%
Notes and Explanations:					
<p>(1) EPA AQS data retrieval 4/2/21. The Design Values are the 3-year average of the annual 98<sup>th</sup> percentile values. To determine attainment status, the Design Values are compared to the 35 µg/m<sup>3</sup> NAAQS. Concentrations are in units of µg/m<sup>3</sup>. Annual values and Design Values that do not meet completeness requirements are shown in red.</p> <p>(2) NAAQS History: The 24-hour PM<sub>2.5</sub> NAAQS was initially established at 65 µg/m<sup>3</sup> in 1997. It was lowered to 35 µg/m<sup>3</sup> in 2006 and retained at the 35 µg/m<sup>3</sup> level in 2012 and again in December 2020.</p> <p>(3) Omaha NCore is a multi-pollutant monitoring site located at 4102 Woolworth Street.</p> <p>(4) The Council Bluffs, Montgomery Co., and Sioux City IA sites are operated by the IA DNR</p> <p>(5) The Montgomery County, IA site is located outside the Omaha MSA at Viking Lake State Park, ~18 miles east of the Mills-Montgomery County line and ~ 45 miles SE of the I-29/I-80 intersection.</p> <p>(6) The Union Co., SD site is operated by the South Dakota Department of Environment &amp; Natural Resources.</p> <p>(7) The Grand Island site was relocated in 2020 and assigned a new AIRS ID. The 2020 value shown is from the new site and the Design Value is computed using values from both old and new sites.</p> <p>(8) The sequential filter-based monitor in Scottsbluff was replaced in 2020 by a continuous monitor, and the site was assigned a new AIRS ID. The 2020 value shown was computed from the continuous monitor data recorded for only 252 days and is thus not valid for NAAQS comparison.</p>					

**Nebraska 2021 Ambient Air Monitoring Network Plan**  
**Appendix B: Comparison of Ambient Air Monitoring Data to NAAQS**

**Table B-6b: PM<sub>2.5</sub> - Annual Average Data** <sup>(1) (2)</sup>

Site	2018	2019	2020	Design Value <sup>(1)</sup>	% NAAQS
<b>Omaha MSA &amp; Montgomery Co., IA <sup>(4)</sup></b>					
<b>Omaha NCore <sup>(3)</sup></b>	8.3	6.8	7.2	7.4	62%
<b>9225 Berry St.; Omaha</b>	8.0	6.9	7.3	7.4	62%
<b>2912 Coffey Ave., Bellevue</b>	9.1	7.8	7.8	8.2	69%
<b>2242 Wright St., Blair</b>	7.6	6.6	6.2	6.8	57%
<b>3130 C Ave., Council Bluffs, IA <sup>(4)</sup></b>	8.8	7.7	8.3	8.3	69%
<b>Montgomery Co., IA (outside Omaha MSA) <sup>(4) (5)</sup></b>	6.9	6.5	6.7	6.7	56%
<b>Lincoln MSA</b>					
<b>3140 N Street, Lincoln</b>	7.1	6.5	6.1	6.6	55%
<b>Sioux City MSA</b>					
<b>901 Floyd Blvd, Sioux City, IA <sup>(4)</sup></b>	8.3	7.4	7.6	7.8	65%
<b>31986 475th Ave, Union Co, SD <sup>(6)</sup></b>	6.3	5.8	6.1	6.1	51%
<b>Other Nebraska Sites</b>					
<b>Grand Island <sup>(7)</sup></b>	6.2	5.0	5.5	5.6	46%
<b>Scottsbluff <sup>(8)</sup></b>	6.3	4.8	8.5	6.5	54%
Notes and Explanations:					
<p>(1) EPA AQS data retrieval 4/2/21. The Design Values are the 3-year average of the annual average values. To determine attainment status, the Design Values are compared to the 12 µg/m<sup>3</sup> NAAQS. Concentrations are in units of µg/m<sup>3</sup>. Annual values and Design Values that do not meet completeness requirements are shown in red.</p> <p>(2) NAAQS History: The annual average PM<sub>2.5</sub> NAAQS was initially established in 1997 at 15µg/m<sup>3</sup>. It was retained at this level in the 2006 review, then lowered to 12 µg/m<sup>3</sup> in December 2012 and retained at that level in December 2020.</p> <p>(3) Omaha NCore is a multi-pollutant monitoring site located at 4102 Woolworth Street.</p> <p>(4) The Council Bluffs, Montgomery Co., and Sioux City IA sites are operated by the IA DNR</p> <p>(5) The Montgomery County, IA site is located outside the Omaha MSA at Viking Lake State Park, ~18 miles east of the Mills-Montgomery County line and ~ 45 miles SE of the I-29/I-80 intersection.</p> <p>(6) The Union Co., SD site is operated by the South Dakota Department of Environment &amp; Natural Resources.</p> <p>(7) The Grand Island site was relocated in 2020 and assigned a new AIRS ID. The 2020 value shown is from the new site and the Design Value is computed using values from both old and new sites.</p> <p>(8) The sequential filter-based monitor in Scottsbluff was replaced in 2020 by a continuous monitor, and the site was assigned a new AIRS ID. The 2020 value shown was computed from the continuous monitor data recorded for only 252 days and is thus not valid for NAAQS comparison.</p>					

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**Appendix B: Comparison of Ambient Air Monitoring Data to NAAQS**

**Table B-7: Lead in Total Suspended Particulate (TSP-Pb)**

<b>Annual Maximum Rolling 3-Month Average Values</b> <sup>(1) (2)</sup>					
<b>Site</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>DV</b> <sup>(1)</sup>	<b>% NAAQS</b>
<b>Fremont</b> <sup>(3)</sup>	0.024	nd	nd	0.024	16%
Notes and Explanations:					
<p>(1) Concentrations are in units of <math>\mu\text{g}/\text{m}^3</math>. The 3-month average NAAQS = <math>0.15 \mu\text{g}/\text{m}^3</math>. The DV or Design Value is the highest 3-month average in the last 3 years. Values from monitors with less than 3 years of data are shown in red.</p> <p>(2) NAAQS History: The initial NAAQS was promulgated in 1978 and was set at <math>1.5 \mu\text{g}/\text{m}^3</math> calendar quarter average. In 2008, it was modified to <math>0.15 \mu\text{g}/\text{m}^3</math> 3-month running average.</p> <p>(3) The Fremont lead monitor was temporarily closed 9/31/2018 pending relocation at the request of the site host. A new location has been determined and approved by EPA Region 7. The new site is expected to be in operation in 2021.</p>					

**Nebraska 2021 Ambient Air Monitoring Network Plan**  
**Appendix C: Compliance Verification with 40 CFR Part 58**

This appendix reviews compliance with applicable requirements in 40 CFR Part 58 Appendices A through E, including revisions effective 4/27/16. Nebraska Ambient Monitoring activities and network are in compliance with these requirements.

**I. 40 CFR Part 58 Appendix A Review**

40 CFR Part 58 Appendix A sets forth quality assurance requirements for the collection, calculation, and reporting of ambient air monitoring data. The *Quality Assurance Project Plan (QAPP) for the Nebraska Ambient Air Monitoring Program for Criteria Pollutants, NCore Parameters, PM<sub>2.5</sub> Speciation, and Total Reduced Sulfur* (EPA approved October 2018) was developed to comply with Part 58 requirements and the provisions of the EPA *Quality Assurance Handbook for Air Pollution Measurement Systems Volume II* (May 2013). The DCHD, LLCHD and NDEE all use this QAPP. Actual procedures for operating monitors, as well as for collecting, reviewing and submitting data, are set forth in Standard Operating Procedures (SOPs) that comply with the QAPP.

40 CFR Part 58 Appendix A also sets forth requirements specifying the number of collocated monitors required for PM<sub>2.5</sub>, PM<sub>10</sub>, PM<sub>10-2.5</sub> and Lead (Pb) monitors. Table C-1 summarizes the collocated sites in Nebraska. All PM and Pb sub-networks operated by DCHD, LLCHD and NDEE either currently meet collocation requirements or will do so after network changes outlined in this 2021 Network Plan.

**II. 40 CFR Part 58 Appendix C Review**

40 CFR Part 58 Appendix C contains requirements for approved ambient air monitoring methodologies. Any monitor that is used to evaluate NAAQS compliance must be a Federal Reference Method (FRM) or a Federal Equivalent Method (FEM) sampler or an alternatively approved method as defined in Appendix C. The network description tables in Appendix A of this network plan identify the sampling method used by each monitor in the Nebraska ambient air monitoring network. All monitors used to evaluate compliance with the NAAQS are FRM or FEM certified. The only monitors that are not FRM/FEM certified are those not subject to 40 CFR Part 58 requirements (i.e., NADP, IMPROVE, RadNet, etc.)

**Nebraska 2021 Ambient Air Monitoring Network Plan**  
**Appendix C: Compliance Verification with 40 CFR Part 58**

<b>Table C-1: Compliance Summary: Collocation Requirements of 40 CFR Part 58 Appendix A<sup>(1)</sup></b>								
Parameter	Primary Sampler Method FRM = Federal Reference Method FEM = Federal Equivalent Method	Percent Collocation Required	NDEE/LLCHD <sup>(2)</sup>			DCHD <sup>(2)</sup>		
			# of Sites	# Collocated	% Collocated	# of Sites	# Collocated	% Collocated
PM <sub>10</sub>	Hi-Vol Sampler (FRM)	15%	0	0	na	2	1	50%
PM <sub>10</sub>	Sequential 2025 Sampler (FRM)	15%	0	0	na	0	0	na
PM <sub>10</sub>	Met One BAM Continuous (FEM)	None	1	0	(3)	1	0	(3)
PM <sub>2.5</sub>	Sequential 2025 Sampler (FRM)	15%	1	1	100%	1	1	100%
PM <sub>2.5</sub>	Met One BAM Continuous (FEM)	15%	3 <sup>(4)(5)</sup>	1 <sup>(4)</sup>	33% <sup>(4)</sup>	3 <sup>(6)</sup>	1	33%
PM <sub>10-2.5</sub>	Met One BAM Continuous (FEM)	None	0	0	na	1	0	(7)
TSP-Lead	Hi-Vol Sampler (FRM)	15% except NCore	1	1	100%	0	0	0

Footnotes:

(1) Collocation Requirements: 40 CFR Part 58 Appendix A requires 15% of the sites in each parameter/method category to have collocated monitors with certain exceptions and additional requirements. Listed site counts incorporate network changes outlined in this Network Plan.

(2) Collocation requirements apply to each Primary Quality Assurance Organization (PQAO) separately. There are two PQAO's in Nebraska: DCHD and NDEE/LLCHD.

(3) Collocated monitors are not required for continuous PM<sub>10</sub> monitors.

(4) Counts include the planned Beatrice site with primary MetOne BAM and collocated sequential PM<sub>2.5</sub> samplers.

(5) LLCHD operates a MetOne BAM PM<sub>2.5</sub> sampler for AirNow and AQI reporting. It is collocated with the primary and collocated sequential samplers at the site.

(6) A MetOne BAM PM<sub>2.5</sub> sampler is being installed at the Blair site, replacing a sequential 2025 FRM sampler.

(7) DCHD operates 2 MetOne BAM samplers at the NCore site. One is set-up to sample PM<sub>2.5</sub> and the other samples PM<sub>10</sub>. PM<sub>10-2.5</sub> is calculated using the results from these 2 samplers. There is a sequential PM<sub>2.5</sub> collocated sampler at the NCore site, but not a collocated PM<sub>10</sub> sampler. Collocated PM<sub>10</sub> samplers are not required in Appendix A for continuous PM<sub>10</sub> samplers. EPA has designated some NCore sites to have collocated samplers for PM<sub>10-2.5</sub>; the Omaha NCore site is not one of them.

<p><b>Network Descriptions:</b></p> <p>NDEE Continuous PM<sub>10</sub>: Weeping Water City (collocation not required)</p> <p>NDEE MetOne BAM Continuous PM<sub>2.5</sub>: Grand Island and Scottsbluff</p> <p>NDEE MetOne BAM Continuous and collocated sequential 2025 PM<sub>2.5</sub>: Beatrice</p> <p>LLCHD Primary and collocated sequential 2025 PM<sub>2.5</sub>: Lincoln</p> <p>NDEE TSP-Lead: Fremont (collocated)</p>	<p>DCHD Hi-Vol PM<sub>10</sub>: 19 &amp; Burt (collocated) and South Omaha</p> <p>DCHD MetOne BAM Continuous PM<sub>10</sub>: NCore</p> <p>DCHD Primary and collocated sequential 2025 PM<sub>2.5</sub>: Berry St</p> <p>DCHD MetOne BAM Continuous and collocated sequential 2025 PM<sub>2.5</sub>: NCore</p> <p>DCHD MetOne BAM Continuous PM<sub>2.5</sub>: Bellevue and Blair</p> <p>DCHD MetOne BAM Continuous PM<sub>10-2.5</sub>: NCore (collocation not required)</p>
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**Nebraska 2021 Ambient Air Monitoring Network Plan**  
**Appendix C: Compliance Verification with 40 CFR Part 58**

### **III. 40 CFR Part 58 Appendix D Review**

40 CFR Part 58 Appendix D sets forth monitoring objectives and minimum monitoring site requirements that must be met. The review that follows demonstrates that the Nebraska ambient air monitoring network meets the Appendix D requirements in effect on February 28, 2013.

EPA periodically re-evaluates the NAAQS and monitoring requirements. Regulatory modifications may impact the minimum monitoring requirements in one of two ways:

- Appendix D minimum monitoring requirements may be changed (i.e., more or less monitoring could be required); or
- Monitoring needs may change as a result of a NAAQS modification (e.g., when the annual average PM<sub>2.5</sub> NAAQS was lowered from 15 ug/m<sup>3</sup> to 12 ug/m<sup>3</sup>, the 85% of NAAQS threshold set forth in 40 CFR Part 58 Appendix D Sec. 4.7 Table D.5 was crossed, and the minimum number of PM<sub>2.5</sub> monitoring sites for the Omaha MSA increased from 1 to 2).

#### **A: 40 CFR Part 58 Appendix D - Objectives Review**

40 CFR Part 58 Appendix D Section 1.1 sets forth three objectives that ambient air monitoring networks must be designed to meet:

- Provide air pollution data to the general public in a timely manner.
- Support compliance with ambient air quality standards and emissions strategy development.
- Support for air pollution research studies.

Each of these objectives is discussed below.

##### **1. Timely Dissemination of Data - Met**

Air monitoring data is made available to the public and other parties in several ways.

- a. Ambient air monitoring data is reviewed quarterly and entered into the national EPA-operated AQS database. The AQS database is available to federal, state, and local monitoring agency personnel, as well as some other public agencies and researchers. AQS data cannot be directly accessed by the general public, but the NDEE does respond to data requests.
- b. Air Quality Index reporting is performed by DCHD and LLCHD for their respective jurisdictions. The AQI information is made available on their respective city websites.
- c. Monitoring data from continuous particulate, ozone, and CO monitors in the Omaha, Lincoln, and Grand Island MSAs and the Scottsbluff MiSA report directly to the EPA AirNow system. The general public can access air quality index information on-line at [www.airnow.gov](http://www.airnow.gov).

##### **2. Support compliance with ambient air quality standards and emissions strategy development – Met**

The NDEE reviews all data collected by DCHD, LLCHD, and NDEE during the previous year as part of the annual data certification process, which is submitted to EPA by May 1<sup>st</sup>. At this time design values are calculated and compared with the NAAQS. This design value information is then incorporated into the annual Network Plan. The annual Network Plans discuss attainment/non-attainment status and monitoring strategies that may be related.

The NDEE, DCHD, and LLCHD also perform data validation reviews at least once each quarter and in many instances monthly. Any potential non-attainment or near non-attainment circumstances will be recognized during these reviews. If such conditions are identified, efforts are made to ascertain the cause and to the extent possible bring about corrective action through regulatory and/or voluntary mechanisms.

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NDEE staff can access current ozone and PM<sub>2.5</sub> values through the AirNow Tech website when needed. When elevated ozone or PM<sub>2.5</sub> levels are reported, this information is passed on to air quality managers at DCHD, LLCHD, and NDEE.

The examples below illustrate how state and local air quality programs have recognized air quality issues and reacted to them.

- a. In the fall of 2011, the 3-month average lead concentration at the Fremont site exceeded the NAAQS. EPA and Magnus Farley, the one known source, were notified. The data were discussed and presented to EPA for review. NDEE and the source conducted an on-site review of the facility and potential emission sources.

In 2012, NDEE continued to calculate daily and 3-month average lead monitoring data as the data became available and disseminated this information to Magnus Farley. High daily lead levels in May thru early July brought the 3-month average within 93% of the NAAQS, and these lead levels were discussed with Magnus Farley. Lower lead levels were seen beginning in July and continuing thereafter. The impact of this information exchange with the source is difficult to evaluate, but it may have played an important role in facilitating the source in remaining diligent with their control efforts.

The NDEE continues to inform Magnus Farley of lead levels as the data become available. Lead levels have remained in attainment with the current DV at 41% of the NAAQS. See Attachment B Table B-7 for 2016-2018 maximum 3-month average data.

- b. From September 2011 thru June 2012, the 46<sup>th</sup> & Farnam site recorded four (4) 24-hour average PM<sub>10</sub> values greater than the 150 µg/m<sup>3</sup> standard. The 46<sup>th</sup> & Farnam site was source-oriented with respect to Omaha Steel Castings Company, and the company had initiated a move to a new location in Wahoo, NE.

Douglas County Health Department notified Omaha Air Quality Control and Omaha Steel of the high values in a timely manner. Omaha Air Quality Control staff met with Omaha Steel to discuss potential PM<sub>10</sub> sources and controls. Omaha Steel proceeded with process-handling and housekeeping changes intended to reduce PM<sub>10</sub> emissions. These efforts were effective in reducing PM<sub>10</sub> levels. Omaha Steel completed their move to their new facility in 2014 and closed the 46<sup>th</sup> & Farnam facility.

- c. In the summer of 2012, Nebraska monitoring sites began reporting ozone levels above those seen in recent years. The NDEE began using AirNow data to track the current 4<sup>th</sup> highest values for sites in and around Nebraska as the ozone season progressed. Although the 4<sup>th</sup> high values at two sites in the Omaha MSA exceeded 0.075 ppm 8-hour ozone NAAQS, the 3-year average design values did not exceed the NAAQS (i.e., the maximum unofficial 2010-2012 DVs = 0.069 ppm).
- d. In the spring of 2014, 2016, and 2017, smoke from prescribed grassland fires in the Flint Hills area of Kansas impacted Nebraska. AirNow data was used to track the degree and extent of the impact on ambient ozone and PM<sub>2.5</sub>. At times, the impact from these controlled burns raised ozone and PM<sub>2.5</sub> levels in Nebraska, but there were no NAAQS violations. Both DCHD and LLCHD issued air quality alerts related to these burns.

Beginning in early 2018, NDEE has engaged with stakeholders and key players to address the air quality impacts associated with prescribed fires in the Flint Hills and the surrounding region. Roundtable meetings are held in February each year to discuss current trends, research, and options for collaboration and coordination to provide timely health advisories and notifications to the public. In addition to the local Nebraska air quality agencies, the group includes representatives from EPA Region 7, Kansas Department of Health and Environment (KDHE), the National Weather Service, the University of Nebraska Lincoln, the Nebraska Department of Health and Human Services (DHHS), the Nebraska Game and Parks Commission, and the Nebraska Prescribed Fire Council.

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As a result of this effort, beginning with the 2018 spring burn seasons KDHE has provided NDEE and local Nebraska air quality agencies with weekly summaries of burn activity in the Flint Hills and the resulting smoke impacts. KDHE also issues predictions of fire activity and impacts for the upcoming week and more frequently as needed. Working group conference calls assess potential smoke impacts and health advisories are issued when needed. These advisories are relayed to relevant local health departments in Nebraska and disseminated to the public by DHHS. The Smoke Awareness web page on the NDEE website has been expanded with additional information on spring burn activity and to provide access to smoke impact outlooks. Although favorable weather patterns during the 2018 through 2020 spring burn seasons resulted in minimal impacts on air quality in Nebraska from Flint Hills burning, the communication framework that has been established will be instrumental in addressing future smoke and air quality impacts and in providing timely communication to the public regarding those impacts and related health concerns.

**3. Support for air pollution research studies – Met**

The NDEE, DCHD, and LLCHD operate the Nebraska SLAMS network in accordance with the monitor specifications, site placement, and QA requirements set forth in 40 CFR Part 50 and 58. EPA R7 provides oversight to ensure that regulatory requirements are met with respect to methodology and QA.

Data is reviewed quarterly before being submitted to EPA's AQS database. Once in AQS, the data is available for pollution research studies.

Near real-time data is also reported to the EPA AirNow data from the continuous PM, CO, and ozone monitors operating in the Omaha and Lincoln MSA. This data is also available for research purposes.

**B: 40 CFR Part 58 Appendix D Review – Minimum Monitoring Site Requirements**

Nebraska meets the requirements set in 40 CFR Part 58 Appendix D for the minimum number of monitoring sites. The minimum monitoring site requirements are set by Core Based Statistical Areas (CBSAs), which include Metropolitan Statistical Areas (MSAs) and Micropolitan Statistical Areas (MiSAs). The minimum monitoring site requirements for each of the four MSAs in Nebraska are examined separately and documented in Tables C-2.a through C-2.d below.

The review for non-MSA areas of the state was performed on a pollutant-specific basis. This review is documented in narrative form in Section III.C below.

It should be noted that the number of monitoring sites required in a network generally needs to be greater than the minimum number required by 40 CFR Part 58 Appendix D. This is stated in 40 CFR Part 58 Appendix D Section 1.1.2: "... total number of monitoring sites that will serve the variety of data needs will be substantially higher than these minimum requirements provide..."

**C: 40 CFR Part 58 Appendix D Review – Minimum Monitoring Requirements for non-MSAs**

**NCore** – (40 CFR Part 58 App. D Sec. 3) No sites required or operated.

Nebraska has one required NCore site located in the Omaha MSA. At this time there is no requirement or plan to develop an additional NCore site in Nebraska.

**Ozone (O<sub>3</sub>)** – (40 CFR Part 58 App. D Sec. 4.1) No sites required or operated.

At this time there is no requirement or plan to deploy ozone monitoring sites outside of the MSAs.

**Carbon Monoxide (CO)** – (40 CFR Part 58 App. D Sec. 4.2) No sites required or operated.

At this time there is no requirement or plan to conduct CO monitoring outside the MSAs. Elevated CO levels are primarily associated with vehicle emissions and congested traffic areas. Highest levels would be anticipated in the Omaha and Lincoln MSAs. Highest concentration site monitoring in Lincoln and

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Omaha has consistently found CO levels well below the NAAQS. Thus there is no need for additional monitoring sites in less populated communities.

**Nitrogen Dioxide (NO<sub>2</sub>)** – (40 CFR Part 58 App. D Sec. 4.3) No sites required or operated.

At this time there is no requirement or plan to conduct NO<sub>2</sub> monitoring outside the MSAs.

**Sulfur Dioxide (SO<sub>2</sub>)** – (40 CFR Part 58 App. D Sec. 4.4) No sites required or operated.

There are no Part 58 requirements to operate SO<sub>2</sub> monitoring sites in non-MSA areas. However, pursuant to Part 51, Subpart BB, monitoring may be used to demonstrate attainment with the 1-hour SO<sub>2</sub> NAAQS. NDEE has no current plans for SO<sub>2</sub> monitoring in non-MSA areas.

**Lead (Pb)** – (40 CFR Part 58 App. D Sec. 4.5)

Two source-oriented sites required; 1 currently suspended and 1 waived.

40 CFR Part 58 Appendix D requires source-oriented monitoring near sources with lead emissions of 0.5 tpy or more. Three sources in Nebraska initially met this threshold: Magnus Farley in Fremont, Magnolia Metals in Auburn, and Nucor Steel in Norfolk.

Monitoring near Magnus Farley in Fremont and Magnolia Metals in Auburn was initiated in 2010. A waiver pursuant to Part 58 Appendix D Section 4.5 was sought from and granted by EPA R7 for Nucor Steel in Norfolk in April 2014. This waiver expired in April 2019. NDEE sought a renewal of this waiver in the 2019 Network Plan, which was approved by EPA R7 in October 2019.

In 2012 and 2013 Magnolia Metals installed pollution-control equipment that reduced their lead emissions to 0.1 tpy. Ambient lead levels dropped to below 5% of the NAAQS in 2015. The 2015 Network Plan proposed to discontinue lead monitoring near Magnolia Metals. The Auburn lead site was shut down in June 2016 in accordance with the approved 2015 Network Plan.

The Magnus Farley facility in Fremont currently is the only Nebraska facility that requires lead monitoring. Monitoring on a property adjacent to this facility was discontinued in September 2018 at the request of the site host. NDEE has identified an alternative site that was approved by EPA Region 7 during a site visit on December 5, 2019. Monitoring of lead emissions by the Magnus Farley facility remains suspended at this time until the alternative site can be established.

**PM<sub>10</sub> Particulate Matter** (40 CFR Part 58 App. D Sec. 4.6) No sites required. No sites operated.

There are no minimum PM<sub>10</sub> monitoring requirements for areas outside of MSAs.

**Fine Particulate Matter: PM<sub>2.5</sub>** (40 CFR Part 58 Appendix D Section 4.7 & 4.7.3) Two (2) sites required and 2 operated.

States are required to operate a background site and a transport site for PM<sub>2.5</sub>. Nebraska's background site is in Scottsbluff, and the transport site is in Grand Island.

**Coarse Particulate Matter: PM<sub>10-2.5</sub>** (40 CFR Part 58 App D Sec 4.8) No sites required or operated.

**Photochemical Assessment Monitoring Stations (PAMS)** (40 CFR Part 58 Appendix D Section 5) No sites required or deployed.

EPA requires state and local air monitoring agencies to make PAMS measurements (including hourly averaged mixing height) at NCore sites in CBSAs with a population of 1,000,000 or more. The 2019 estimated population of the Omaha-Council Bluffs MSA, where Nebraska's only NCore site is located, was 949,442 which is below the threshold requiring PAMS monitoring.

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**Tables C-2.a through C-2d: Minimum Monitoring Reviews for Each Nebraska MSA\***

<b>Table C-2a: 40 CFR Part 58 Appendix D Review: Omaha-Council Bluffs MSA (MSA Population ~ 949,400)</b>					
<b>Pollutant</b>	<b>App. D Citation</b>	<b>Review Criteria &amp; Comments</b>	<b>Sites Required</b>	<b>NE Sites Operated</b>	<b>Criteria Met?</b>
<b>Ozone</b>	Sec. 4.1 Table D-2	The Omaha MSA population is between 350K to 4M and O <sub>3</sub> levels are ≥ 85% of NAAQS ( <i>See Design Values in Attachment B</i> ).	2	3 Includes NCore	Y
<b>CO</b>	Sec. 4.2	The population threshold for requiring a near-road CO monitoring site in a CBSA is 1 million. The population of the Omaha MSA is below this threshold.	0	2 Includes NCore	Y
<b>NO<sub>2</sub></b>	Sec. 4.3.2	The Omaha MSA has a population between 500K and 1M and is thus not currently required to have a near-road NO <sub>x</sub> monitoring site.	0	0	Y
	Sec.4.3.3	Area-Wide monitoring only required if CBSA ≥ 1M (Omaha MSA population < 1 M)	0	1 @ NCore	Y
	Sec. 4.3.4	Regional Administrator required monitoring: None at this time.	0	0	Y
<b>SO<sub>2</sub></b>	Sec. 4.4	The need for SO <sub>2</sub> sites is based on the <i>Population Weighted Emissions Index</i> (PWEI). Omaha's PWEI = 19,682, which falls within the 5,000 to 100,000 range requiring 1 site (see Table C-3 below for PWEI calculation data). The current network of two highest concentration sites and one NCore site exceeds the minimum requirements.	1	3 Includes NCore	Y
		Regional Administrator required monitoring: None at this time.	0	0	Y
<b>Lead</b>	Sec. 4.5 (a)	There are no sources emitting ≥ 0.5 tpy of lead in the Nebraska portion of the Omaha MSA.	0	0	Y
	Sec. 4.5 (b)	Revised regulations effective 4/27/16 eliminated the requirement for one community-based lead monitor at each NCore site. DCHD discontinued lead monitoring at the Omaha NCore site at the end of 2017 in accordance with this regulation change and the 2017 Network Plan.	0	0	Y
	Sec. 4.5 (c)	Regional Administrator required monitoring: None at this time.	0	0	Y
<b>PM<sub>10</sub></b>	Sec. 4.6 Table D-4	The Omaha MSA has a population between 500K – 1M and a medium PM <sub>10</sub> concentration range with max values > 80% of NAAQS at 46 <sup>th</sup> & Farnam St Site in 2014 and 2015 and at the Weeping Water Farm site on four dates from 2014 to 2016. See Attachment B for PM <sub>10</sub> data.	2-4	4 Includes NCore & 1 site @ Weeping Water	Y
<b>PM<sub>2.5</sub></b>	Sec 4.7 Table D-5	The Omaha MSA has a population between 500K – 1M and PM <sub>2.5</sub> levels < 85% of NAAQS range ( <i>See Design Values in Appendix B</i> ).	1	4 Includes NCore	Y
	Sec 4.7.2	Continuous monitor required.	1	1 @ NCore	Y
	Sec. 4.7.4	PM <sub>2.5</sub> Speciation Trends Network monitoring required (included SASS and URG samplers as one)	1	1 @ NCore	Y
<b>PAMS</b>	Sec. 5	Only required for areas classified as serious, severe, or extreme non-attainment for O <sub>3</sub> and at NCore sites in CBSAs with populations over 1,000,000. Omaha MSA population < 1 million.	0	0	NA
<b>NCore</b>	Sec. 3	Omaha has been designated to operate an NCore site with NO <sub>x</sub> /NO <sub>y</sub> monitoring.	1	1	Y
* Unless noted otherwise, this analysis does not count monitors located in Iowa toward meeting the minimum monitoring requirements. It does consider pollutant levels measured at Iowa sites when determining minimum monitoring needs for ozone and PM <sub>2.5</sub> .					

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<b>Table C-2.b: 40 CFR Part 58 Appendix D Review: Lincoln MSA (Population ~ 336,400)</b>					
<b>Pollutant</b>	<b>App. D Citation</b>	<b>Review Criteria &amp; Comments</b>	<b>Sites Required</b>	<b>Sites Operated</b>	<b>Criteria Met?</b>
<b>Ozone</b>	Sec. 4.1 Table D-2	The Lincoln MSA population is between 50K to 350K and O <sub>3</sub> levels < 85% of NAAQS ( <i>See Design Values in Attachment B</i> ).	0	1	Y
<b>CO</b>	Sec. 4.2	No minimum requirement	0	0	Y
<b>NO<sub>2</sub></b>	Sec. 4.3.2	Near-road monitoring: No requirement for CBSA < 500K.	0	0	Y
	Sec.4.3.3	Area-Wide monitoring only required if CBSA ≥ 1M (Lincoln MSA population < 1 M).	0	0	Y
	Sec. 4.3.4	Regional Administrator required monitoring: none.	0	0	Y
<b>SO<sub>2</sub></b>	Sec. 4.4	The number of SO <sub>2</sub> sites required is based on the <i>Population Weighted Emissions Index (PWEI)</i> . Lincoln's PWEI = 912, which falls below 5,000 (see Table C-3 below for PWEI calculation data). Thus no sites are required. However, LLCHD began operating a source-oriented SO <sub>2</sub> monitor near Hallam, NE in December 2016.	0	1	Y
		Regional Administrator required monitoring: none.	0	0	Y
<b>Lead</b>	Sec. 4.5 (a)	There are no sources emitting ≥ 0.5 tpy of lead.	0	1	Y
	Sec. 4.5 (b)	Community-based monitoring not required.	0	1	Y
	Sec. 4.5 (c)	Regional Administrator required monitoring: none.	0	0	Y
<b>PM<sub>10</sub></b>	Sec. 4.6 Table D-4	The Lincoln MSA population is between 250K and 500K. Monitoring is only required if current monitoring indicates PM <sub>10</sub> ≥ 85% of NAAQS. <i>The highest 24-hr value found during monitoring in Lincoln from 1988-98 was 102 µg/m<sup>3</sup> or 68% of the NAAQS, and PM<sub>10</sub> concentrations have been declining in Nebraska since that time.</i>	0-1	0	Y
<b>PM<sub>2.5</sub></b>	Sec 4.7 Table D-5	The Lincoln MSA population is between 50K – 500K and PM <sub>2.5</sub> levels < 85% of NAAQS ( <i>See Design Values in Appendix B</i> ).	0	1	Y
	Sec 4.7.2	Continuous monitor not required.	0	1	Y
	Sec. 4.7.4	PM <sub>2.5</sub> Speciation Trends Network monitoring not required.	0	0	Y
<b>PAMS</b>	Sec. 5	Only required for areas classified as serious, severe, or extreme non-attainment for O <sub>3</sub> .	0	0	Y
<b>NCORE</b>	Sec. 3	Lincoln has not been designated to operate an NCORE site.	0	0	Y

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<b>Table C-2.c: 40 CFR Part 58 Appendix D Review: Sioux City MSA (Population ~ 169,900) *</b>					
<b>Pollutant</b>	<b>App. D Citation</b>	<b>Review Criteria &amp; Comments</b>	<b>Sites Required</b>	<b>NE Sites Operated</b>	<b>Criteria Met?</b>
<b>Ozone</b>	Sec. 4.1 Table D-2	The Sioux City MSA population is between 50K and 350K. Appendix D Sec. 4.1, Table D-2 says that for MSAs of this size 1 ozone site is required if the DV $\geq$ 85% of the NAAQS. There is one ozone monitor in the MSA located in a rural area of Union County, SD. The 3-year Design Value from this Union County site is 64 ppb or 91% of the NAAQS. <i>Nebraska has no current plans to install a second ozone monitor in the Sioux City MSA.</i>	1	0	Y See comment
<b>CO</b>	Sec. 4.2	No minimum requirement.	0	0	Y
<b>NO<sub>2</sub></b>	Sec. 4.3.2	Near-road monitoring: No requirement for CBSA < 500K.	0	0	Y
	Sec. 4.3.3	Area-Wide monitoring only required if CBSA $\geq$ 1M (Sioux City MSA population < 1 M)	0	0	Y
	Sec. 4.3.4	Regional Administrator required monitoring; none.	0	0	Y
<b>SO<sub>2</sub></b>	Sec. 4.4	The number of SO <sub>2</sub> sites required is based on the <i>Population Weighted Emissions Index (PWEI)</i> . Sioux City MSA's PWEI = 1,679, which falls below the 5,000 to 100,000 range requiring 1 site (see Table C-3 below for PWEI calculation data). <i>One site exists in the MSA in Union County, SD.</i>	0	0	Y See comment
		Regional Administrator required monitoring: none	0	0	Y
<b>Lead</b>	Sec. 4.5 (a)	There are no sources emitting $\geq$ 0.5 tpy of lead in the Nebraska portion of the Sioux City MSA.	0	0	Y
	Sec. 4.5 (b)	Community-based lead monitoring not required.	0	0	Y
	Sec. 4.5 (c)	Regional Administrator required monitoring: none.	0	0	Y
<b>PM<sub>10</sub></b>	Sec. 4.6 Table D-4	The Sioux City MSA population is between 100K – 250K and PM <sub>10</sub> levels are < 80% of NAAQS ( <i>See Design Values in Attachment B</i> ).	0	0	Y
<b>PM<sub>2.5</sub></b>	Sec 4.7 Table D-5	The Sioux City MSA population is between 50K and 500K and PM <sub>2.5</sub> levels are < 85% of NAAQS, thus no monitor is required. ( <i>See Design Values in Appendix B</i> ).	0	0	Y
	Sec 4.7.2	Continuous monitor not required	0	0	Y
	Sec. 4.7.4	PM <sub>2.5</sub> Speciation Trends Network monitoring not required	0	0	Y
<b>PAMS</b>	Sec. 5	Only required for areas classified as serious, severe, or extreme non-attainment for O <sub>3</sub>	0	0	Y
<b>NCORE</b>	Sec. 3	The Nebraska portion of the Sioux City MSA has not been designated to operate an NCORE site.	0	0	Y
* Unless noted otherwise, this analysis does not count monitors located in Iowa and South Dakota toward meeting the minimum monitoring requirements. It does use pollutant levels measured at IA and SD monitoring sites, when determining minimum monitoring needs for ozone and PM.					

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<b>Table C-2.d: 40 CFR Part 58 Appendix D Review: Grand Island MSA (Population ~ 75,550)</b>					
<b>Pollutant</b>	<b>App. D Citation</b>	<b>Review Criteria &amp; Comments</b>	<b>Sites Required</b>	<b>Sites Operated</b>	<b>Criteria Met?</b>
<b>Ozone</b>	Sec. 4.1 Table D-2	Grand Island MSA population is between 50K -350K. Monitoring is only required if current monitoring finds O <sub>3</sub> > 85% of NAAQS as set forth in Part 58 Appendix D Table D-2.	0	0	Y
<b>CO</b>	Sec. 4.2	No minimum requirement.	0	0	Y
<b>NO<sub>2</sub></b>	Sec. 4.3.2	Near-road monitoring: No requirement for CBSA < 500K.	0	0	Y
	Sec.4.3.3	Area-Wide monitoring only required if CBSA ≥ 1M (Grand Island MSA population < 1 M)	0	0	Y
	Sec. 4.3.4	Regional Administrator required monitoring: none	0	0	Y
<b>SO<sub>2</sub></b>	Sec. 4.4	<i>Population Weighted Emissions Index</i> (PWEI) = 53, which falls below 5,000 (see Table C-3 below for PWEI calculation data). No monitoring sites required.	0	0	Y
		Regional Administrator required monitoring: none	0	0	Y
<b>Lead</b>	Sec. 4.5 (a)	There are no sources emitting ≥ 0.5 tpy of lead	0	0	Y
	Sec. 4.5 (b)	Community-based lead monitoring not required.	0	0	Y
	Sec. 4.5 (c)	Regional Administrator required monitoring: none	0	0	Y
<b>PM<sub>10</sub></b>	Sec. 4.6 Table D-4	PM <sub>10</sub> monitoring is not required if MSA population < 100,000	0	0	Y
<b>PM<sub>2.5</sub></b>	Sec 4.7 Table D-5	Grand Island’s CBSA population is between 50K – 500K and PM <sub>2.5</sub> levels are < 85% of NAAQS ( <i>See Design Values in Appendix B</i> )	0	1 <sup>(1)</sup>	Y
	Sec 4.7.2	Continuous monitoring is not required	0	0	Y
	Sec. 4.7.4	PM <sub>2.5</sub> Speciation Trends Network monitoring is not required	0	0	Y
<b>PAMS</b>	Sec. 5	Only required for areas classified as serious, severe, or extreme non-attainment for O <sub>3</sub>	0	0	Y
<b>NCore</b>	Sec. 3	The Grand Island MSA has not been designated to operate a NCore site	0	0	Y
Footnote: (1) The PM <sub>2.5</sub> site operated in Grand Island is Nebraska’s transport site.					



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<b>Table C-3: SO<sub>2</sub> Population Weighted Emissions Index (PWEI) Data for Nebraska Core Based Statistical Areas (CBSAs) <sup>(a) (b) (c)</sup></b> <span style="float: right;">Page 1 of 2</span>							
CBSA	County	Population 7/1/2020 <sup>(c)</sup>	SO <sub>2</sub> Emissions (tons/year)		SO <sub>2</sub> Emissions % Change	PWEI <sup>(a) (b)</sup>	
			2014 EI	2017 EI		2014 EI	2017 EI
Omaha MSA	Douglas	574,332	11,498	8,980	-22%	25,528	<b>19,682</b>
	Sarpy	188,856	58	267	360%		
	Cass	26,232	1,269	749	-41%		
	Saunders	21,927	34	46	35%		
	Washington	20,901	30	63	110%		
	Pottawattamie, IA	93,328	13,797	10,430	-24%		
	Mills, IA	14,766	15	30	100%		
	Harrison, IA	13,928	50	60	20%		
	<b>Totals</b>	<b>954,270</b>	<b>26,751</b>	<b>20,626</b>	<b>-23%</b>		
Lincoln MSA	Lancaster	320,650	3,424	2,628	-23%	1,166	<b>912</b>
	Seward	17,186	27	73	170%		
	<b>Totals</b>	<b>337,836</b>	<b>3,451</b>	<b>2,701</b>	<b>-22%</b>		
Sioux City MSA	Woodbury, IA	103,138	13,472	9,316	-31%	2,306	<b>1,679</b>
	Plymouth, IA	25,219	25	331	1224%		
	Dakota	20,070	24	138	475%		
	Dixon	5,596	12	29	142%		
	Union, SD	16,192	12	50	317%		
	<b>Totals</b>	<b>170,215</b>	<b>13,545</b>	<b>9,865</b>	<b>-27%</b>		
Grand Island MSA <sup>(d)</sup>	Hall	61,028	1,528	622	-59%	120	<b>53</b>
	Howard	6,488	29	27	-7%		
	Merrick	7,809	30	52	73%		
	<b>Totals</b>	<b>75,325</b>	<b>1,587</b>	<b>701</b>	<b>-56%</b>		
<p>Observation: The EPA's emission inventory data indicates that SO<sub>2</sub> emissions from the four Nebraska MSAs decreased by 22% to 56% from 2014 to 2017.</p>							
<p>Footnotes at bottom of page 2 of this table.</p>							

**Nebraska 2021 Ambient Air Monitoring Network Plan**  
**Appendix C: Compliance Verification with 40 CFR Part 58**

<b>Table C-3 (continued): SO<sub>2</sub> Population Weighted Emissions Index (PWEI) Data for Nebraska Core Based Statistical Areas (CBSAs) <sup>(a) (b) (c)</sup></b>							
CBSA	County	Population 7/1/2020 <sup>(c)</sup>	SO <sub>2</sub> Emissions (tons/year)		SO <sub>2</sub> Emissions (%) Change)	PWEI <sup>(a) (b)</sup>	
			2014 EI	2017 EI		2014EI	2017 EI
Kearney MiSA	Buffalo	50,114	34	137	303%	2	<b>9</b>
	Kearney	6,652	4	16	300%		
	<b>Totals</b>	<b>56,766</b>	<b>38</b>	<b>153</b>	<b>303%</b>		
Norfolk MiSA	Madison	34,813	16	102	538%	8	<b>16</b>
	Pierce	7,184	28	37	32%		
	Stanton	5,880	126	188	49%		
	<b>Totals</b>	<b>47,877</b>	<b>170</b>	<b>327</b>	<b>92%</b>		
Hastings MiSA	Adams	<b>31,321</b>	<b>3,172</b>	<b>2,604</b>	-18%	99	<b>82</b>
Scottsbluff MiSA	Banner	786	1	1	0%	7	<b>8</b>
	Scotts Bluff	35,299	163	224	37%		
	Sioux	1,200	12	1	-92%		
	<b>Totals</b>	<b>37,285</b>	<b>176</b>	<b>226</b>	<b>28%</b>		
North Platte MiSA	Lincoln	34,347	24,534	21,346	-13%	873	<b>759</b>
	Logan	747	1	4	300%		
	McPherson	474	3	2	-33%		
	<b>Totals</b>	<b>35,568</b>	<b>24,538</b>	<b>21,352</b>	<b>-13%</b>		
Fremont MiSA	Dodge	<b>36,222</b>	<b>2,247</b>	<b>1,032</b>	<b>-54%</b>	81	<b>37</b>
Columbus MiSA	Platte	<b>33,364</b>	<b>395</b>	<b>516</b>	<b>31%</b>	13	<b>17</b>
Lexington MiSA	Dawson	23,510	29	114	293%	1	<b>3</b>
	Gosper	1,986	6	11	83%		
	<b>Totals</b>	<b>25,496</b>	<b>35</b>	<b>125</b>	<b>257%</b>		
Beatrice MiSA	Gage	<b>21,431</b>	<b>31</b>	<b>93</b>	<b>200%</b>	1	<b>2</b>

Footnotes:

(a) Population Weighted Emission Index (PWEI) = (CBSA Population) x (SO<sub>2</sub> Emissions (tpy))/1,000,000.

(b) SO<sub>2</sub> Emission data were obtained from the EPA National Emission Inventory database for 2011, 2014, and 2017. The 2017 NEI data is the most recent data available from EPA at the time this table was created (May 7, 2020).

(c) U.S. Census population estimate data for 7/1/2020 were used in this table and the PWEI calculations.

(d) Prior to September 2018, the Grand Island MSA also included Hamilton County, Nebraska. The PWEI calculated with 2017 Emission Inventory data is currently applicable. The PWEI was also calculated with 2014 EI data to document any change that might have occurred.

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**Appendix C: Compliance Verification with 40 CFR Part 58**

**IV: 40 CFR Part 58 Appendix E Review**

This appendix sets forth requirements for probe and monitoring path placement, including: horizontal and vertical placement, spacing from minor sources, spacing from obstructions, spacing from trees, spacing from roadways, cumulative interferences on a monitoring path, maximum monitoring path length, and probe material and sample residence time. Compliance with these criteria is verified when the site is set up and periodically thereafter. Compliance is evaluated using review sheets developed for that purpose.

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# Nebraska Department of Environment and Energy

## 2021 Annual Report on Modeled Facilities (Data Requirements Rule, 2010 SO<sub>2</sub> NAAQS)

NEBRASKA

Good Life. Great Resources.

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DEPT. OF ENVIRONMENT AND ENERGY

**Jim Macy, Director**  
**May 10, 2021**

**Nebraska 2021 Ambient Air Monitoring Network Plan  
Appendix D**

## **Introduction**

The Data Requirements Rule (DRR) for the 2010 1-hour SO<sub>2</sub> Primary National Ambient Air Quality Standards (NAAQS) was issued in August 2015 and outlines ongoing requirements for states with areas designated as attainment based on air quality modeling. Of the three areas in Nebraska subject to the rule, there are two areas that meet the criteria for ongoing requirements.

Nebraska Department of Environment and Energy (NDEE) asserts that all areas continue to demonstrate attainment with the NAAQS, and that additional air quality modeling is not necessary at this time. Analysis of emissions data and discussion are provided below.

## **Areas Subject to Ongoing Requirements**

The areas surrounding three coal-fired electrical generating plants in Nebraska are subject to the ongoing requirements described in 40 CFR Part 51.1205:

- Gerald Gentleman Station near Sutherland
- Gerald Whelan Energy Center, Hastings
- Nebraska City Station

Modeling analyses used to characterize these areas utilized actual emissions data provided on the following pages, and these areas have no subsequent “nonattainment” designations.

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**The area surrounding Gerald Gentleman Station (GGS), Sutherland, NE**

Nebraska Public Power District (Lincoln County)

The modeling analysis used to characterize this area was performed in September 2015 and utilized actual facility emissions from 2012-2014. This analysis indicated the SO<sub>2</sub> impact (99<sup>th</sup> percentile 1-hour SO<sub>2</sub> concentration) on the area to be 144.8 µg/m<sup>3</sup>, or 55.3 parts per billion (ppb). This impact value equates to 73.7% of the 1-hour SO<sub>2</sub> NAAQS of 75 ppb, and this area (Lincoln County) was designated “unclassifiable/attainment” on July 12, 2016 (81 FR 45039).

Emissions data for GGS are shown in Table D-1. Data from 2012-2014 used in the modeling analysis, and emissions data for 2018-2020, are included for comparison. The SO<sub>2</sub> emissions reported for 2020 indicate a 22.4% decrease from 2019, and the 2018-2020 average emissions indicate a 12.6% decrease from the 2012-2014 modeled three-year average. Overall facility SO<sub>2</sub> emissions have decreased 31.2% since 2012. Therefore, NDEE asserts that the area surrounding GGS continues to be in attainment with the 1-hour SO<sub>2</sub> NAAQS, and additional modeling is not necessary at this time.

GGS participates in the Cross-State Air Pollution Rule (CSAPR) trading program for SO<sub>2</sub>, and actual 2020 facility emissions are below the SO<sub>2</sub> allocations of 13,780 tons (Unit 1) and 15,116 tons (Unit 2).<sup>1</sup>

Unit	SO <sub>2</sub> Emissions (tons per year)					
	2012	2013	2014	2018	2019	2020
1	14,832	13,047	12,539	14,334	10,467	10,187
2	11,605	15,383	11,945	13,405	12,946	7,989
<b>Total</b>	<b>26,437</b>	<b>28,430</b>	<b>24,484</b>	<b>27,739</b>	<b>23,413</b>	<b>18,176</b>
<b>Average (2012-2014)</b>	<b>26,450</b>					
<b>Average (2018-2020)</b>				<b>23,109</b>		

Emissions data acquired from the Clean Air Markets Division, <https://ampd.epa.gov/ampd/>.

<sup>1</sup> <https://www.epa.gov/csapr/cross-state-air-pollution-rule-csapr-allowance-allocations-and-templates>

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Appendix D**

**The area surrounding Gerald Whelan Energy Center**

Hastings Utilities (Adams County)

The modeling analysis used to characterize this area was performed in December 2016 and utilized actual facility emissions data from 2013-2015. This analysis indicated the SO<sub>2</sub> impact (99<sup>th</sup> percentile 1-hour SO<sub>2</sub> concentration) on the area to be 188.7 µg/m<sup>3</sup>, or 72.02 parts per billion (ppb), which equates to 96% of the NAAQS. This impact value is below the 1-hour SO<sub>2</sub> NAAQS of 75 ppb and the area (Adams County) was designated “attainment/unclassifiable” on January 9, 2018 (83 FR 1098).

Emissions data for Whelan Energy Station are shown in Table D-2. Data from 2013-2015 used in the modeling analysis, and emissions data for 2018-2020, are included to provide comparison. The data for 2013-2015 have been corrected in this report, as previous reports had emission totals incorrectly attributed by year. The SO<sub>2</sub> emissions reported for 2020 indicate an 8% decrease from 2019, and the 2018-2020 average emissions indicate a 5.6% decrease from the 2013-2015 modeled three-year average. Overall facility SO<sub>2</sub> emissions have decreased 5.4% since 2012. Therefore, NDEE asserts that the area surrounding Gerald Whelan Energy Center continues to be in attainment with the 1-hour SO<sub>2</sub> NAAQS, and additional modeling is not necessary at this time.

Gerald Whelan Energy Center participates in the Cross-State Air Pollution Rule (CSAPR) trading program for SO<sub>2</sub> (Unit 1), and actual 2020 emissions from Unit 1 are below the SO<sub>2</sub> allocations of 1,722 tons for that unit.<sup>2</sup>

<b>Table D-2. Gerald Whelan Energy Center</b>						
<b>Unit</b>	<b>SO<sub>2</sub> Emissions (tons per year)</b>					
	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
1	1,439	2,302	1,495	1,776	1,622	1,641
2	692	598	409	567	569	374
<b>Total</b>	<b>2,131</b>	<b>2,900</b>	<b>1,904</b>	<b>2,343</b>	<b>2,191</b>	<b>2,015</b>
<b>Average (2013-2015)</b>	<b>2,312</b>					
<b>Average (2018-2020)</b>				<b>2,183</b>		

Emissions data (except for 2018-Unit 2) acquired from the Clean Air Markets Division, <https://ampd.epa.gov/ampd/>. Data for 2018 (Unit 2) was obtained using methodology described in the 2019 Annual Report on Modeled Facilities.

<sup>2</sup> <https://www.epa.gov/csapr/cross-state-air-pollution-rule-csapr-allowance-allocations-and-templates>



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**The area surrounding Nebraska City Station (NCS)**

Omaha Public Power District (Otoe County)

This area was last addressed in the 2017 Modeled Facilities Report. Per 40 CFR Part 51.1205(b)(2), the state is not required to annually report on areas in which the impact value is less than 50% of the NAAQS; thus, this area was not addressed in the 2018, 2019, and 2020 reports. Discussion of the area is being included in this report due to an increase in facility SO<sub>2</sub> emissions in 2020.

The modeling analysis used to characterize this area was performed in August 2015 and utilized actual facility emissions data from 2012-2014. This analysis indicated the SO<sub>2</sub> impact (99<sup>th</sup> percentile 1-hour SO<sub>2</sub> concentration) on the area to be 78.5 µg/m<sup>3</sup>, or 32.7 parts per billion (ppb). This impact value is below the 1-hour SO<sub>2</sub> NAAQS of 75 ppb and the area was designated “unclassifiable/attainment” on July 12, 2016 (81 FR 45039).

Emissions data for NCS are shown in Table D-3. Data from 2012-2014 used in the modeling analysis, and emissions data for 2018-2020 are included to provide comparison.

In 2020, SO<sub>2</sub> emissions from this facility increased 10.5% as compared to 2019, which is attributed to a 17.6% increase in heat input and 18.4% increase in operating time.<sup>3</sup> Despite the increase, overall facility emissions have decreased by 31.5% since 2012, and the 2018-2020 average emissions indicate an 21.6% decrease from the 2012-2014 modeled three-year average. Therefore, NDEE asserts that the area surrounding NCS continues to be in attainment with the 1-hour SO<sub>2</sub> NAAQS, and that additional modeling is not necessary at this time.

<b>Table D-3. Nebraska City Station</b>						
<b>Unit</b>	<b>SO<sub>2</sub> Emissions (tons per year)</b>					
	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
1	14,544	14,696	13,969	14,754	8,452	9,459
2	2,222	2,214	2,165	2,455	1,934	2,020
<b>Total</b>	<b>16,766</b>	<b>16,910</b>	<b>16,134</b>	<b>17,209</b>	<b>10,386</b>	<b>11,479</b>
<b>Average (2012-2014)</b>	<b>16,603</b>					
<b>Average (2018-2020)</b>				<b>13,025</b>		

Emissions data acquired from the Clean Air Markets Division, <https://ampd.epa.gov/ampd/>.

NCS participates in the Cross-State Air Pollution Rule (CSAPR) trading program for SO<sub>2</sub>, and actual 2020 facility emissions are below the SO<sub>2</sub> allocations of 12,313 tons (Unit 1) and 3,377 tons (Unit 2).<sup>4</sup>

<sup>3</sup> Clean Air Markets Division, <https://ampd.epa.gov/ampd/>

<sup>4</sup> <https://www.epa.gov/csapr/cross-state-air-pollution-rule-csapr-allowance-allocations-and-templates>

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Omaha Public Power District voluntarily requested and obtained a plantwide applicability limit (PAL) permit, issued by NDEE in March of 2020, that limits total Nebraska City Station SO<sub>2</sub> emissions to less than 17,389 tons per year. This PAL is 4.7% greater than the 2012-2014 average SO<sub>2</sub> emissions provided in Table D-3 that was the basis for modeling, which demonstrated the impact in the area surrounding Nebraska City Station at 43.6% of the 2010 SO<sub>2</sub> NAAQS. The NCS is meeting this PAL with some margin.

## **Conclusion**

Analysis of emissions data from the areas subject to the ongoing requirements indicates that these areas continue to demonstrate attainment with the 2010 1-hour SO<sub>2</sub> NAAQS. Based on this analysis, NDEE asserts that additional modeling is not necessary at this time to further characterize these areas.

## **Public Notice**

This document was made available for public inspection and comment from May 7, 2021 until June 7, 2021. No comments were received during this time.