

# Pechanga Tribal Government

## *Pechanga Environmental Department*

P.O. Box 1477 Temecula, CA 92593 (951) 770-6000

# PUBLIC NOTICE

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The Pechanga Environmental Department, on behalf of the Pechanga Tribal Government, has updated the Tribe's Annual Air Network Plan for 2023. The Air Network Plan provides technical information on how air data is collected, analyzed, and stored at Pechanga's air station. As part of compliance with the Clean Air Act (CAA) Pechanga Environmental Department will be accepting public comments on the Plan for 30 calendar days, commencing **May 31, 2023** and closing **June 30, 2023 at 5:00 pm.**

To obtain a copy of the Annual Air Network Plan, please request a copy from the front desk of the Pechanga Government Center. Copies of this document will also be on file in the Pechanga Environmental Department and available on request, and also available as a portable document file (pdf) download from Pechanga's website ([www.pechanga-nsn.gov](http://www.pechanga-nsn.gov)).

All comments must be made in writing and can be submitted via email (PTG\_Environmental@pechanga-nsn.gov), via standard mail (P.O. Box 1477, Temecula, CA 92593, ATTN: Pechanga Environmental Department), or delivered in person to the front desk of the Pechanga Government Center (ATTN: Pechanga Environmental Department).

Please note that the Pechanga Government Center is open from **8:00 am-5:00 pm Monday through Friday**, excluding holidays.

For questions or comments regarding this notice, please contact:

Pechanga Environmental Department  
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## **Pechanga Band of Indians Environmental Department**

*Annual Network Plan 2023*

July 1, 2023  
Pechanga Band of Indians | Environmental Department  
P.O. Box 1477 | Temecula | California | 92593

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## Introduction

The United States Environmental Protection Agency (EPA), through the Code of Federal Regulations (CFR) requires the Pechanga Band of Indians (Tribe) to complete the Ambient Air Monitoring Annual Network Plan for the Tribe's ambient air monitoring station. EPA's requirements for the annual plan are listed in 40 CFR § 58.10.

The regulations from Title 40, Part 58, Section 10(a) of the Code of Federal Regulations (40 CFR 58.10, (a)(1)) state that:

*“Beginning July 1, 2007, the state, or where applicable local, agency shall submit to the Regional Administrator an annual monitoring network plan which shall provide for the documentation of the establishment and maintenance of an air quality surveillance system that consists of a network of SLAMS monitoring stations that can include FRM, FEM, and ARM monitors that are part of SLAMS, NCore, CSN, PAMS, and SPM stations. The plan shall include a statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E of this part, where applicable. The Regional Administrator may require additional information in support of this statement. The annual monitoring network plan must be made available for public inspection and comment for at least 30 days prior to submission to the EPA and the submitted plan shall include and address, as appropriate, any received comments.”*

It is the Tribe's objective to maintain and operate its ambient air monitoring station according to all applicable federal regulations and guidance documents. The air station meets the requirements listed in CFR 58.10 (a)(1); except where otherwise noted, each monitor meets the requirements of appendices A, B, C, D, and E, where applicable. The purpose of this Ambient Air Monitoring Network Plan (Plan) is to provide evidence that current regulations are being met for the Pechanga air monitoring network, to detail any changes proposed for the 18 months following its publication, and to provide specific information on the existing monitoring site.

The Tribe operates the Air Monitoring Program through the Pechanga Environmental Department (PED). The PED staff performs a complete review of the Pechanga Air Program annually to ensure the program is running effectively and within compliance for valid data submission.

The Pechanga Air Program began in 2008 with the collection of air quality data according to the program Quality Assurance Project Plan (QAPP) which follows the US EPA National Ambient Air Quality Standards (NAAQS). The data collected and monitored at Pechanga Air Station includes ozone (O<sub>3</sub>), Particulate Matter (PM<sub>2.5</sub>), and oxides of nitrogen (NO<sub>x</sub>), which are submitted to the EPA online Air Quality System (AQS) quarterly. In 2022, the Pechanga Air station began submitting data to airnow.gov. There has been an update to the program. On January 20, 2023, the NO<sub>x</sub> analyzer was taken offline and the program was discontinued. A letter was emailed to Gwen Yoshimura at the Geographic Strategies and Modeling Section, EPA office. See Appendix B. There are no other changes to the program and no new determinations.

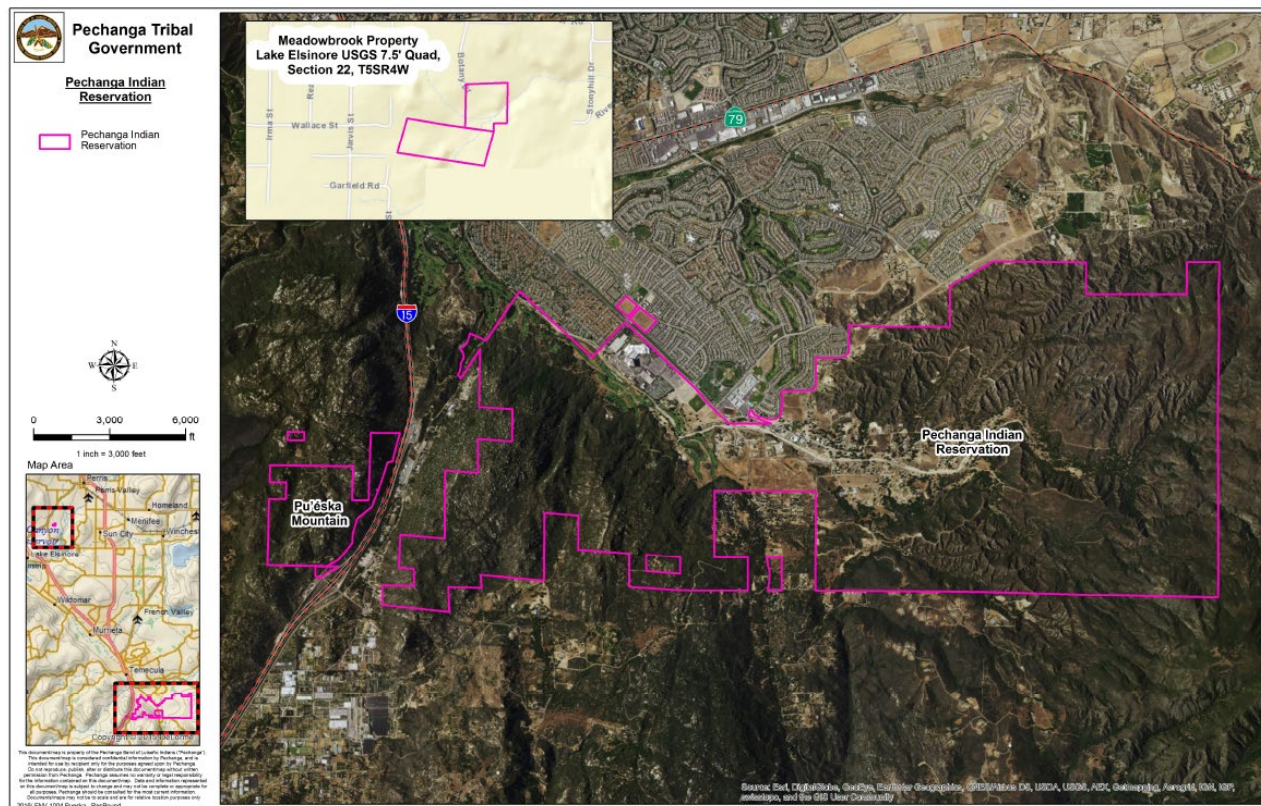
## Public Comment

The Annual Monitoring Network Plan must be made available for public review and comment for 30 days prior to submission to U.S. EPA. Information on how to comment on the plan and any comments received are listed in Appendix A.

The Annual Network Plan is available on the Pechanga website and a public notice is posted notifying the public of the document's availability for review and comment. The community and public are able to access the report and submit written comments on the Plan. The state and local agencies are also able to access the plan for review and comment, including input on any changes to a PM<sub>2.5</sub> monitoring network that impacts the location of a violating PM<sub>2.5</sub> monitor. Any comments received by the PED are reviewed, documented and added to Plan, as applicable.

## Network Design

The Tribe has been operating its air monitoring station since 2008. The site is located on the Pechanga Indian Reservation (Reservation) on the southeastern boundary of the city of Temecula (Figure 1). The single air monitoring site collects data for multiple pollutants. Table 1 provides a list of monitoring locations, pollutants monitored and the EPA AQS site code. On April 3, 2015, the Environmental Protection Agency (EPA) took a final action to revise the boundaries of the Southern California air quality planning areas to designate the reservation of the Pechanga Band of Indians of the Pechanga Reservation, as a separate air quality planning area for the 1997 8-hour ozone National Ambient Air Quality Standard.



**Figure 1 – Pechanga Air Station Location - Air Quality Planning Area for the 2015 8-hour ozone National Ambient Air Quality Standard**

Site Name	AQS Code	Pollutants Monitored
Pechanga Air Station	TT-586-0009	NO <sub>2</sub> * O <sub>3</sub> PM <sub>2.5</sub>

\*NO<sub>2</sub> analyzer taken offline, January 20, 2023.

**Table 1 Pechanga Air Station Pollutants Monitored**

### Site Selection and Purpose

The selection of the air monitoring site was based on the basic monitoring objectives listed below:

- determine representative concentrations and exposure in areas of population density;
- determine the highest concentrations of pollutants in an area based on topography and/or wind patterns;
- judge compliance with and/or progress made towards meeting the NAAQS;
- track pollution trends;
- determine general background concentration levels (The exact location of a site is most often dependent on the logistics of the area chosen for monitoring, such as site access, security and power availability); and,
- determine the welfare-related impacts in more rural and remote areas such as visibility impairment and effects on vegetation.

### NAAQS Comparable

40 CFR Part 58 Appendix B requires the identification of any sites that are suitable or not suitable for comparison against the 24-hour PM<sub>2.5</sub> NAAQS as described in Section §58.30. Pechanga air station meets this NAAQS requirement.

### Minimum Monitoring Requirements

The Pechanga monitoring station meets the minimum monitoring requirements for all criteria pollutants O<sub>3</sub>, PM<sub>2.5</sub>, NO<sub>2</sub> (Tables 2, 3, and 4). The data is certified annually, the last report which includes the APM 600 was submitted May 25, 2023, for the 2022 data.



## **Ozone**

Ground-level O<sub>3</sub>, or photochemical smog, is not emitted into the atmosphere as ozone, but rather is formed by the reactions of other pollutants. The primary pollutants entering into this reaction, Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO<sub>x</sub>), create ozone in the presence of sunlight (ultraviolet radiation).

Ozone exposure has been associated with increased susceptibility to respiratory infections, medication use, doctor and emergency department visits and hospital admissions for individuals with lung disease. Ozone exposure also increases the risk of premature death from heart and lung disease. Children are at increased risk from ozone because their lungs are still developing and they are more likely to have increased exposure since they are often active outdoors<sup>1</sup>.

In addition, cumulative ozone exposure can lead to reduced tree growth; visibly injured leaves and increased susceptibility to disease, damage from insects and harsh weather. These effects can have adverse impacts on ecosystems, including loss of species and changes to habitat quality, and water and nutrient cycles<sup>2</sup>.

**Table 2 Minimum Monitoring Requirements for O<sub>3</sub>**

<b>Tribal Land</b>	<b>County</b>	<b>County Population in July 1, 2020 (US Census Bureau)<sup>1</sup></b>	<b>Annual Design Value 2020-2022 (ppm)</b>	<b>Monitors Required</b>	<b>Active Monitors</b>	<b>Monitors Needed</b>
Pechanga Indian Reservation	Riverside CA Metro Area / San Diego-Chula Vista-Carlsbad, CA Metro Area	2,418,185 / 3,359,630	0.073	1	1	0

<sup>1</sup> 2021 is the most recent Census estimate available for download at Metropolitan and Micropolitan Statistical Areas Totals: 2020-2021 (census.gov)

The Pechanga air station is collecting ozone data to be used by the Tribe to make regulatory decisions in support of tribal sovereignty. The data are also collected for use by the community and for the Tribe to monitor NAAQS compliance. The data are submitted to AQS to demonstrate compliance with NAAQS and to support research by the community and regulatory agencies.

The equipment used in the station is a Teledyne API T400 ozone analyzer which is used to measure continuous ambient concentrations of ozone (O<sub>3</sub>). The T400 operates on the principle that ozone (O<sub>3</sub>) molecules absorb UV light at a wavelength of 254 nm. The sample is drawn into the

<sup>1</sup> U.S. EPA. 2015. Ozone and Your Patients' Health Training for Health Care Providers. (<http://www.epa.gov/apti/ozonehealth/population.html>)

<sup>2</sup> U.S. EPA. 2015. Ground-level Ozone Ecosystem Effects. (<http://www.epa.gov/groundlevelozone/ecosystem.html>)

analyzer through the sample bulkhead and is split into two gas streams. The two samples are then analyzed and averaged. This analyzer was designated by the EPA as an equivalent method for the monitoring of O<sub>3</sub>, (EQOA-0992-087).

The station has been using the DR DAS datalogger since October 2016. The datalogger began collecting data on November 14, 2016. This software provides the O<sub>3</sub> data in 1-minute, hourly, 8-hourly, and daily averages. The statistics that are calculated and presented in the O<sub>3</sub> data reports include: 1) maximum 1-hour average for the month; and, 2) maximum running 8-hour average for each day. Both are calculated per the method described in 40 CFR 50 Appendix I.

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

Fine particulate matter with a diameter of 2.5 microns or less is created primarily from industrial processes and fuel combustion. These particles are breathed deeply into the lungs. Exposure to particle pollution is linked to a variety of significant health problems ranging from aggravated asthma to premature death in people with heart and lung disease<sup>3</sup>.

**Table 3 Minimum Monitoring Requirements for PM<sub>2.5</sub>**

<b>Tribal Land</b>	<b>County</b>	<b>County Population in July 1, 2020 (US Census Bureau) <sup>1</sup></b>	<b>Annual Design Value 2020-2022 <math>\mu\text{g}/\text{m}^3</math></b>	<b>24-Hr Design Value <math>\mu\text{g}/\text{m}^3</math></b>	<b>Monitors Required</b>	<b>Active Monitors</b>	<b>Monitors Needed</b>
Pechanga Indian Reservation	.Riverside CA Metro Area / .San Diego-Chula Vista-Carlsbad, CA Metro Area	2,418,185 / 3,359,630	6.2	17	0	2	0

The Pechanga air station is collecting PM<sub>2.5</sub> data to be used by the Tribe to make regulatory decisions in support of tribal sovereignty. The data are also collected for use by the community and for the Tribe to monitor NAAQS compliance. The data are submitted to AQS to demonstrate compliance with NAAQS and to support research by the community and regulatory agencies. All sites are suitable for comparison against the annual PM<sub>2.5</sub> NAAQS.

The method used for the Beta Attenuation Monitor Model 1020 configured for PM<sub>2.5</sub> Federal Equivalent Method (FEM) monitoring includes sampling of ambient air through a standard EPA PM<sub>10</sub> inlet head and a Very Sharp Cut Cyclone (VSCC) at a volumetric flow rate of 16.7l per minute. A Smart Heater attached to the inlet system, and controlled by relative humidity (RH) measured at the filter tape, minimizes positive artifact from water sorption in humid environments. Particles in the air stream are collected and measured on quartz fiber filter tape. PM<sub>2.5</sub> concentrations and sampling attribute data are reported hourly for a 24-hour period, from midnight

<sup>3</sup> AirNow. 2015. Particle Pollution (PM). (<http://www.airnow.gov/index.cfm?action=aqibasics.particle>)



to midnight. The equipment is listed in the EPA list of designated reference and equivalent methods as: EQPM-0798-122.

A collocated PM<sub>2.5</sub> sampler at the air station is a Thermo Scientific Partisol Model 2000i. The Partisol 2000i Air Sampler was designed to conform to the U.S. EPA Federal Reference Method for fine particulate sampling. The hardware was designed to meet or exceed the requirements of CFR 40 Part 50. It is located 1.5 meters from the primary sampler, at a right angle to the prevailing southwest wind direction. Its sample inlet is nine meters above the ground, at the same height as the primary sampler. The Partisol 2000i sampler operates by splitting a PM<sub>10</sub> sample stream into its fine (PM<sub>2.5</sub>) and coarse fractions (particles between 2.5 and 10 microns in size) using an U.S. EPA designed virtual impactor for the 2.5 micron cutpoint. The system collects particulate matter on two 47 mm diameter filters simultaneously. The sampler is operated for a 24-hour period, from midnight to midnight, once every 6 days, according to the national schedule<sup>4</sup>. The equipment is listed in the EPA list of designated reference and equivalent methods as: RFPS-0694-098.

## **NO<sub>2</sub>**

NO<sub>2</sub> is a highly toxic, reddish brown gas that is created primarily from fuel combustion in industrial sources and vehicles. It creates an odorous haze that causes eye and sinus irritation, blocks natural sunlight, and reduces visibility.

**Table 4 Minimum Monitoring Requirements for NO<sub>2</sub>**

<b>Tribal Land</b>	<b>County</b>	<b>County Population in July 1, 2020 (US Census Bureau)<sup>1</sup></b>	<b>Annual Design Value 2020-2022 (ppm)</b>	<b>Monitors Required</b>	<b>Active Monitors</b>	<b>Monitors Needed</b>
Pechanga Indian Reservation	.Riverside CA Metro Area / .San Diego-Chula Vista-Carlsbad, CA Metro Area	2,418,185 / 3,359,630	18	0	1	0

The Pechanga air station is collecting NO<sub>2</sub> data to be used by the Tribe to make regulatory decisions in support of tribal sovereignty. The data are also collected for use by the community and for the Tribe to monitor NAAQS compliance. The data are submitted to AQS to demonstrate compliance with NAAQS and to support research by the community and regulatory agencies.

The air program uses a Teledyne Model T200 Nitrogen Oxides Analyzer which uses chemiluminescence detection, coupled with state-of-the-art microprocessor technology to provide the sensitivity, stability and ease of use needed for ambient or dilution CEM monitoring requirements of nitric oxide (NO), nitrogen dioxide (NO<sub>2</sub>) and the total nitrogen oxides (NO<sub>x</sub>) The

<sup>4</sup> U.S. EPA. 2015. Nitrogen Dioxide Health. (<http://www.epa.gov/airquality/nitrogenoxides/health.html>)

equipment is listed in the EPA list of designated reference and equivalent methods as: RFNA-1104-099.

The station uses a datalogger, DR. DAS, and associated software which provides the NO<sub>x</sub> data in 1-minute, hourly, 8-hourly, and daily averages. The data are then processed and averaged for comparisons to federal ambient air quality standards. The statistics that are calculated and presented in the NO<sub>x</sub> data reports are: 1) maximum 1-hour average for each day; 2) maximum 1-hour average for the month; and 3) the annual mean.

On January 20, 2023, the NO<sub>x</sub> analyzer was taken offline and the program was discontinued. A letter was emailed to Gwen Yoshimura at the Geographic Strategies and Modeling Section, EPA office.

### **Meteorological Instruments**

The purposes of the meteorological measurements at the Pechanga air station are to provide local information to the Tribe and to assist in providing characterizations of regional-scale meteorological patterns in conjunction with the air quality measurements.

The station uses the Vaisala WXT520 equipment to collect meteorological data, with the exception of the precipitation, for data validation. The equipment uses specific data collection and analysis methods. They are as follows:

**For wind speed:** the WXT520 uses Vaisala WINDCAP® sensor technology in wind measurement. The wind sensor has an array of three equally spaced ultrasonic transducers on a horizontal plane. Wind speed and wind directions are determined by measuring the time it takes the ultrasound to travel from each transducer to the other two. The wind sensor measures the transit time (in both directions) along the three paths established by the array of transducers. This transit time depends on the wind speed along the ultrasonic path. For zero wind speed, both the forward and reverse transit times are the same. With wind along the sound path, the up-wind direction transit time increases and the down-wind transit time decreases. The wind speed is calculated from the measured transit times using the formula.

**For precipitation:** For rain data the station uses the Ecotech Rainmaster 1000 Tipping Bucket rain gauge. Each unit consists of a collector funnel with leaf filter, an integrated measurement mechanism and an outer enclosure with quick release fasteners. The bucket tips when precipitation of 0.01 inch, 0.2mm or 0.5mm has been collected. Each tip activates a reed switch closure which is detected by a data logger. The rainwater can be collected in a bottle located beneath the rain gauge for sample verification or further analysis.

**For pressure, temperature, and humidity measurement:** WXT520 uses the measurement principle of the pressure, temperature, and humidity sensors. Measurement is based on an advanced RC oscillator and two reference capacitors against which the capacitance of the sensors is continuously measured. The microprocessor of the transmitter performs compensation for the temperature dependency of the pressure and humidity sensors.

### **Data Availability**

Data is submitted to EPA through the AQS and the data can be accessed through the system. The types of data submitted to AQS include the hourly values for the continuous monitors, the FRM data, the precision checks and 1-point QC checks. The department annually reviews the data and submits a letter and data certification to EPA for the Annual Data Certification requirement. Currently, the PED makes data available to Pechanga Tribal Members upon request.

### **Monitoring Objectives.**

The ambient air monitoring networks must be designed to meet three basic monitoring objectives. These basic objectives are listed below. The appearance of any one objective in the order of this list is not based upon a prioritized scheme. Each objective is important and must be considered individually:

- (a) Provide air pollution data to the general public in a timely manner. The Pechanga Air program makes their data available through AQS. The data are uploaded into the AQS quarterly.
- (b) The Pechanga air program will work to capture data to meet compliance with NAAQS standards and emissions strategy development. Data from monitors of various types can be used in the development of attainment and maintenance plans.
- (c) The Pechanga Air Program submits information to AQS which can be accessed for the purpose of support for air pollution research studies.

## **Detailed Site Information**

### **Site Name: Pechanga**

The Pechanga ambient air monitoring station was established in the spring of 2008 in order to represent regional-scale air quality. It is located at the Pechanga Government Center. On April 3, 2015 EPA designated the Pechanga Reservation as a separate air quality planning area for the 1997 8-hour ozone National Ambient Air Quality Standard (NAAQS).

### **Recent or Proposed Changes**

The Pechanga Air Program anticipates continuing the current program that is in place. The department is planning to install a second ozone monitoring station on the Reservation. This monitor will collect data for the Tribe and the data will be used for comparison to the current Pechanga ozone monitoring location. The program will continue to monitor and maintain the level of technical and professional proficiency as a designated separate air quality planning area for the 1997 8-hour ozone NAAQS.

The program is continuing to research the location for the second station. Due to the COVID-19 pandemic, the process has been delayed over the year. The general location will be on the Reservation, most likely the western side, and the exact location is still in discussion. The Pechanga Air Program will continue to monitor and maintain the equipment and data; the program

will be evaluated annually to comply with federal regulations and other regulations that may apply.

During the most recent Technical System Audit in 2021, Pechanga staff visited the proposed site locations with EPA staff. There was discussion about the site selection and proposed equipment. Due to the site location there are many departments involved in the process and future construction. The second site is still in process and has a tentative install date of spring 2024.

**Table 5 Pechanga Air Network Site Information**

Site Name	Pechanga			
AQS ID	TT-586-0009			
GPS coordinates	33°26'52.37"N 117° 5'19.30"W			
Location	Pechanga Government Center, Pechanga Reservation			
Address	12705 Pechanga Road, Temecula, CA 92593			
Counties	Riverside and San Diego			
Distances to roads	Pechanga Road: 57meters Pechanga Parkway: 1,075 meters Pala Road: 608 meters I-15: 4.6 kilometers			
Traffic counts	Pechanga Road: no data (road is within Reservation) Pechanga Parkway 9030 ADT (2019 data) <sup>1</sup> Pechanga Parkway north of Deer Hollow Way: 15160 (2021 data) <sup>1</sup> I-15: 97000 ADT (2021data) <sup>2</sup> <sup>1</sup> ( <a href="https://temeculaca.gov/DocumentCenter/View/209/Traffic-Count-Summary-PDF?bidId=">https://temeculaca.gov/DocumentCenter/View/209/Traffic-Count-Summary-PDF?bidId=</a> ) <sup>2</sup> ( <a href="https://dot.ca.gov/programs/traffic-operations/census">https://dot.ca.gov/programs/traffic-operations/census</a> )			
Groundcover	Paved from east to north; vegetated from south to west			
Representative Area	Pechanga Band of Indians Reservation- Riverside and San Diego County, Temecula, CA Tribal Land			
Pollutant, Parameter Occurrence Code (POC)	<b>Ozone</b> 1	<b>PM<sub>2.5</sub></b> 1	<b>PM<sub>2.5</sub> FRM</b> 2	<b>NO<sub>2</sub></b> 1
Primary / QA Collocated / Other	Primary	Primary	Collocated	Primary
Parameter Code	44201	88101	88101	42602
Site Type	General/background & regional transport	General/background & regional transport	General/background & regional transport	General/background & regional transport
Monitor Type	SLAMS	SLAMS	SLAMS	SLAMS
Network Affiliation	Pechanga	Pechanga	Pechanga	Pechanga
Method Code	087	170	143	099
FRM / FEM / ARM / Other	FEM	FEM	FRM	FEM
Collecting Agency	Pechanga Band	Pechanga Band	Pechanga Band	Pechanga Band
Analytical Lab	NA	N/A	IML Air Science 555 Absaraka Street Sheridan, WY 82801	NA
Reporting Agency	Pechanga Band	Pechanga Band	Pechanga Band	Pechanga Band
Spatial scale	Regional	Regional	Regional	Regional
Monitoring Start Date	June 9, 2008	August 12, 2008	August 12, 2008	July 25, 2008
Current Sampling Frequency	Continuous	Continuous	1 in 6	Continuous
Sampling method	Photometric	Beta Attenuation	Beta Attenuation	Chemiluminescent

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July 2023

	EQOA-0992-087	EQPM-0308-170	EQPS-0509-177	RFNA-1292-090
Analysis method	N/A	N/A	N/A	N/A
Start date	June 9, 2008	August 12, 2008	August 12, 2008	July 25, 2008
Operation schedule	Continuous	Continuous	1 in 6 coll	Continuous
Sampling season	Year round	Year round	Year round	Year round
Probe height†	1.26 meters	2.6 meters	2.03 meters	1.26 meters
Distance from supporting structure	1.3 meters	2.5 meters	2.4 meters	1.3 meters
Distance from obstructions on roof	16.15 meters horizontal 2.5 meters vertical	17.07 meters horizontal 2.5 meters vertical	15.24 meters horizontal 2.5 meters vertical	16.15 meters horizontal 2.5 meters vertical
Distance from obstructions not on roof	50.3 meters Horizontal 3 meters Vertical	50.3 meters Horizontal 3 meters Vertical	50.3 meters Horizontal 3 meters Vertical	50.3 meters Horizontal 3 meters Vertical
Distance from tree dripline	50.3 meters	50.3 meters	50.3 meters	50.3 meters
Distance to furnace or incinerator flue	N/A	N/A	N/A	N/A
Distance between collocated monitors	N/A	2.34 meters	2.34 meters	N/A
Unrestricted airflow	360°	360°	360°	360°
Probe material	Teflon	Teflon	N/A	Teflon
Residence time for reactive gases NO/NO <sub>2</sub> /NO <sub>y</sub> , SO <sub>2</sub> , O <sub>3</sub> ; PAMS: VOCs, Carbonyls (seconds)	5.80	N/A	N/A	8.90
Will there be changes within the next 18 months?	No	No	No	No
Is it suitable for comparison against the annual PM <sub>2.5</sub> ?	N/A	Yes	Yes	N/A
Frequency of flow rate verification for manual PM samplers audit	N/A	N/A	Monthly	N/A
Frequency of flow rate verification for automated PM analyzers audit	N/A	Monthly	N/A	N/A
Frequency of one-point QC check (gaseous)	weekly	N/A	N/A	weekly
Last Annual Performance Evaluation (gaseous)	07/01/2022	N/A	N/A	07/01/2022
Last two semi-annual flow rate audits for PM monitors	N/A	02/02/2022 06/24/2022	02/02/2022 06/24/2022	N/A

† Height listed is distance from roof. Equipment is mounted on roof of Government Center building, 7.8 meters above ground level.

Site Name	Pechanga			
Meteorological	Wind Speed	Wind Direction	Ambient Temp	Rel. Humidity

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July 2023

Manufacturer	Vaisala	Vaisala	Vaisala	Vaisala
Model	WXT520	WXT520	WXT520	WXT520
Range	0.4 to 50.0 m/s	000 to 360°	-10.0 to 50.0°C	0-100% RH
Analysis method	Automatic Sensor and Formulation	Automatic Sensor and Formulation	RC Oscillator	RC Oscillator
Start date	April 27, 2015	April 27, 2015	April 27, 2015	April 27, 2015
Height above ground	11 meters	11 meters	9 meters	9 meters
Vertical distance from supporting structure	3.3 meters	3.3 meters	1.5 meters	1.5 meters
Horizontal distance from supporting structure	N/A	N/A	N/A	N/A
Distance from obstructions on roof	16 meters	16 meters	16 meters	16 meters
Distance from obstructions not on roof	50 meters/ SW	50 meters/ SW	50 meters/ SW	50 meters/ SW
Unrestricted airflow	360°	360°	360°	360°

Site Name	Pechanga			
<b>Meteorological</b>	<b>Precipitation</b>	<b>Solar Radiation</b>	<b>Pressure</b>	
Manufacturer	Ecotech	Middleton	Vaisala	
Model	Rainmaster 1000	SK01-D2	WXT520	
Range	N/A	0 to 1400 wt/m <sup>2</sup>	600 to 800 mm Hg	
Analysis method	Tipping bucket	Differential thermopile	RC Oscillator	
Start date	December 28, 2018	April 27, 2015	April 27, 2015	
Height above ground	8 meters	8 meters	5 meters	
Vertical distance from supporting structure	3.3 meters	3.3 meters	1.5 meters	
Horizontal distance from supporting structure	N/A	N/A	N/A	
Distance from obstructions on roof	16 meters	16 meters	16 meters	
Distance from obstructions not on roof	16 meters	16 meters	16 meters	
Unrestricted airflow	360°	360°	360°	



## **Appendix A – Public Comment**

# Pechanga Tribal Government

## *Pechanga Environmental Department*

P.O. Box 1477 Temecula, CA 92593 (951) 770-6000

# PUBLIC NOTICE

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The Pechanga Environmental Department, on behalf of the Pechanga Tribal Government, has updated the Tribe's Annual Air Network Plan for 2017. The Air Network Plan provides technical information on how air data is collected, analyzed, and stored at Pechanga's air station. As part of compliance with the Clean Air Act (CAA) Pechanga Environmental Department will be accepting public comments on the Plan for 30 calendar days, commencing **May 31, 2023** and closing **June 30, 2023 at 5:00 pm**.

To obtain a copy of the Annual Air Network Plan, please request a copy from the front desk of the Pechanga Government Center. Copies of this document will also be on file in the Pechanga Environmental Department and available on request, and also available as a portable document file (pdf) download from Pechanga's website ([www.pechanga-nsn.gov](http://www.pechanga-nsn.gov)).

All comments must be made in writing and can be submitted via email (PTG\_Environmental@pechanga-nsn.gov), via standard mail (P.O. Box 1477, Temecula, CA 92593, ATTN: Pechanga Environmental Department), or delivered in person to the front desk of the Pechanga Government Center (ATTN: Pechanga Environmental Department).

Please note that the Pechanga Government Center is open from **8:00 am-5:00 pm Monday through Friday**, excluding holidays.

For questions or comments regarding this notice, please contact:

Pechanga Environmental Department  
Tiffany Wolfe, Environmental Specialist  
(951) 770-6151  
[twolfe@pechanga-nsn.gov](mailto:twolfe@pechanga-nsn.gov)

## **Appendix B – Modification of NO<sub>2</sub> Program**



**PECHANGA INDIAN RESERVATION**  
*Temecula Band of Luiseño Mission Indians*

Post Office Box 1477 • Temecula, CA 92593  
Telephone (951) 770-6000 Fax (951) 695-1778

Tribal Chairman:  
Mark Macarro

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Catalina R. Chacon  
Marc Luker  
Robert "R.J." Munoa  
Russell "Butch" Murphy  
Michael Vasquez

Tribal Secretary:  
Louise Burke

Tribal Treasurer:  
Amy Minniear

January 20, 2023

Ms. Gwen Yoshimura  
Manager, Geographic Strategies and Modeling Section (AIR-2-2)  
Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

Dear Ms. Yoshimura:

The purpose of this letter is to provide notice and justification for the modification of the Pechanga Air Monitoring program's nitrogen dioxide (NO<sub>2</sub>) monitoring program in accordance with 40 CFR 58.14.

**Modification of the NO<sub>2</sub> program at the Pechanga Indian Reservation**

This data summary is to support the modification (closure) of the NO<sub>2</sub> data collection program located on the Pechanga Reservation. The monitoring site has not shown to be a benefit to the program due the following reasons:

- There are currently no other NO<sub>2</sub> sites within 50 miles of the Pechanga site to compare the data (Riverside Site - 59 miles away);
- The supplies related to the precision checks for the program (NO<sub>2</sub> gas) are proving to be more difficult and costlier over the span of the program;
- The NO<sub>2</sub> data has proven to be within the EPA National Ambient Air Quality Standards (NAAQS) for the past 7 years.

***Summary:***

In 2008, the Pechanga Band of Indians (Tribe) began monitoring for Ozone (O<sub>3</sub>), Nitrogen Dioxide (NO<sub>2</sub>), and Particle Pollution - PM<sub>2.5</sub> on the Pechanga Reservation (Reservation). The monitoring site is located at the Pechanga Government Center on the Reservation (12705 Pechanga Road, Temecula, CA 92592). In 2015, the United States Environmental Protection Agency (USEPA) published a designation in the Federal Register (Docket Number: EPA-R09-OAR-2014-0869) affirming a separate air quality planning area consistent with the boundaries of the Reservation and a designation of "attainment" for ozone.

The ozone program has been the focus of data collection for the Pechanga Air Program, due significant concerns for health and safety (<https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>). This criteria pollutant has shown exceedance of the

Ozone NAAQS standard for Pechanga<sup>1</sup>. However, in comparison to the Temecula air monitoring station (managed by the South Coast Air Pollution Control District) the Pechanga data are closer to the attainment standard.

The NO<sub>2</sub> program has been operating under the assumption that data were informational for many years, however data quality assurance and quality control methods are equivalent to a regulatory program. The data collected has shown to be 70% below the primary 1-hour NAAQS. The information shown in the tables below supports the decision to close the NO<sub>2</sub> program. The Pechanga Air Program also monitors for PM<sub>2.5</sub> FEM/FRM and will continue with this program.

***NAAQS Table:***

The table below is an excerpt from the EPA website: NAAQS Table (<https://www.epa.gov/criteria-air-pollutants/naaqs-table>). The NAAQS table lists the primary standard and secondary standard for the criteria pollutant, NO<sub>2</sub>.

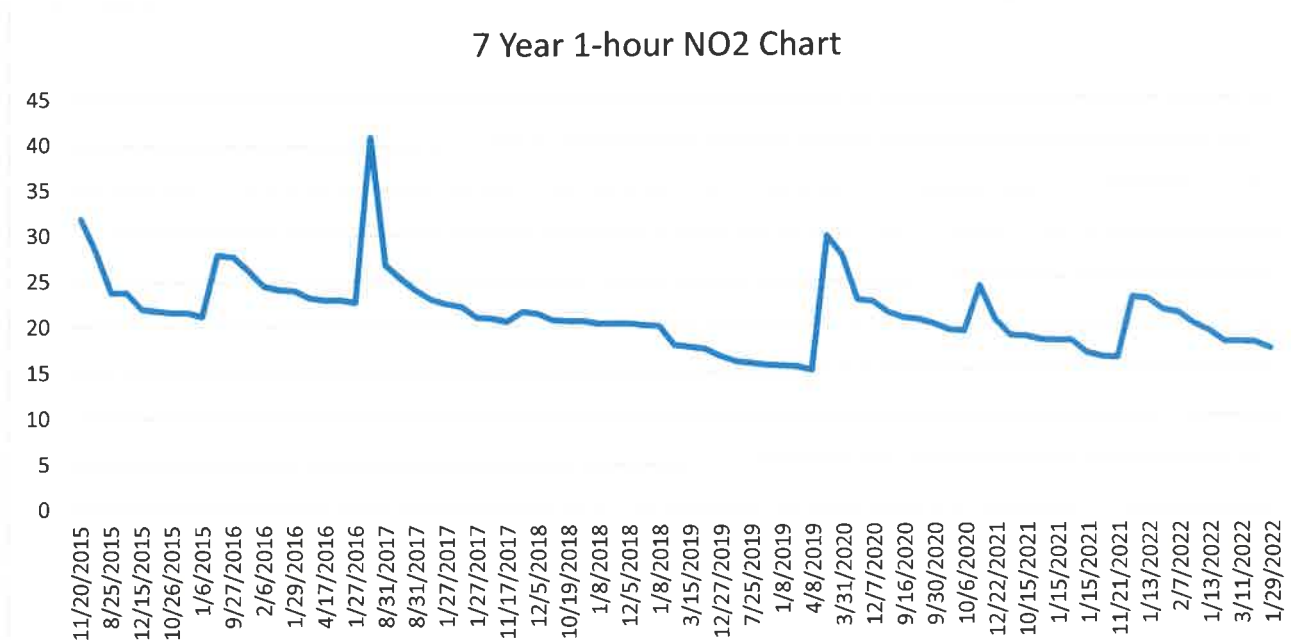
Pollutant [links to historical tables of NAAQS reviews]	Primary/ Secondary	Averaging Time	Level	Form
Nitrogen Dioxide (NO <sub>2</sub> ) < <a href="https://epa.gov/no2-pollution/timeline-nitrogen-dioxide-no2-national-ambient-air-quality-standards-naaqs">https://epa.gov/no2-pollution/timeline-nitrogen-dioxide-no2-national-ambient-air-quality-standards-naaqs</a> >	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

***Pechanga Data 2015-2022:***

The chart below shows the 10 highest values collected and reported over the last 7 years, for the Pechanga monitoring station. This information reflects the data from the AQS 440 report. The highest data value point is 40.9 ppb/1-hour, this occurred in 2016. The trend shown is in a downward slope.

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<sup>1</sup> Please refer to AQS for all current and historic validated data collected at the Pechanga Air Station (2008-present)



The 3-year Design Value reflects this downward trend. According to the NAAQS, the NO2 standard indicates that 98th percentile of 1-hour daily maximum concentrations, averaged over 3 years should not exceed 100ppb. The data from the Pechanga station reports the highest value in the table below as 23 ppb. This data was collected and formatted from the AQS 480 report.

#### ***Three Year Design Value Table:***

Year	3-Year Design Value (ppb)
2015	23
2016	22
2017	22
2018	21
2019	18
2020	18
2021	17
2022	18

#### ***Conclusion:***

After reviewing the Pechanga NO2 data for the years 2015-2022, we have concluded that it is in the best interest of the Pechanga Air Program to close the NO2 monitoring and will redirect funding to support the regulatory Ozone program and the PM2.5 program.

The 40 CFR 58.14 - System Modification outlines information regarding a modification to an air program. The Pechanga Air program requests to modify the program by discontinuing the NO2 program and meets the following criteria in 40 CFR 58.14(c)(1).

*(c) State, or where appropriate, local agency requests for SLAMS monitor station discontinuation, subject to the review of the Regional Administrator, will be approved if any of the following criteria are met and if the requirements of appendix D to this part, if any, continue to be met. Other requests for discontinuation may also be approved on a case-by-case basis if discontinuance does not compromise data collection needed for implementation of a NAAQS and if the requirements of appendix D to this part, if any, continue to be met.*



*(1) Any PM<sub>2.5</sub>, O<sub>3</sub>, CO, PM<sub>10</sub>, SO<sub>2</sub>, Pb, or NO<sub>2</sub> SLAMS monitor which has shown attainment during the previous five years, that has a probability of less than 10 percent of exceeding 80 percent of the applicable NAAQS during the next three years based on the levels, trends, and variability observed in the past, and which is not specifically required by an attainment plan or maintenance plan. In a nonattainment or maintenance area, if the most recent attainment or maintenance plan adopted by the State and approved by EPA contains a contingency measure to be triggered by an air quality concentration and the monitor to be discontinued is the only SLAMS monitor operating in the nonattainment or maintenance area, the monitor may not be discontinued.*

The data provided in the tables, charts, and reports (AMP 440 & AMP480) included will support the modification to the program.

If you have any questions, comments, or concerns, please contact the Pechanga Air Program Director, Kelcey Stricker: [kstricker@pechagna-nsn.gov](mailto:kstricker@pechagna-nsn.gov), 951-770-6153.

Regards,

A handwritten signature in dark ink, appearing to read 'Mark Macarro', with a horizontal line extending from the left side of the signature.

Mark Macarro  
Tribal Chairman