

**Annual Report of Air Quality Monitoring  
January 1 to December 31, 2024, at the  
Gregory – Portland  
Community Air Monitoring Stations**

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## Executive Summary

There are three continuous air quality monitoring stations operating in the Gregory-Portland area. The Gregory Fresnos Community Air Monitoring Station on Fresnos St. began continuous monitoring operations October 1, 2019. Two additional air-monitoring stations in Portland, TX, one near the intersection of Buddy Ganem Dr. and Wildcat Dr. on the campus of the Gregory-Portland High School and the other on Broadway Blvd. on the campus of the old East Cliff Elementary School, began operations on January 1, 2020. The U.S. Environmental Protection Agency (EPA) generally uses three years of data collection to assess attainment with the National Ambient Air Quality Standards (NAAQS). This project has now collected and validated data for more than five years at the Gregory Fresnos station and five years at the other two stations.

Since monitoring began, some measured pollutant concentrations have exceeded the concentration levels of NAAQS; however, these values have not been sustained long enough or measured frequently enough to violate a NAAQS. Furthermore, measured hydrocarbon concentrations have not exceeded the levels of concern published by the Texas Commission on Environmental Quality (TCEQ). In fact, the measured concentrations of two EPA criteria pollutants – sulfur dioxide (SO<sub>2</sub>) and nitrogen dioxide (NO<sub>2</sub>) had the lowest NAAQS concentration averages in the state over the 2020 to 2022 three-year period, and average hydrocarbon concentrations are among the lowest of the Texas automated gas chromatograph monitors (auto-GCs) across the state.

The public website developed as the community's source for information about the community air monitors continues to provide information about air quality and monitoring data from the three air monitoring stations (<https://gpair.ceer.utexas.edu> accessed January 2025).

UT Austin would be happy to answer any questions or conduct additional analysis at the community's or sponsors' requests. Contact Vincent Torres at [ymtorres@mail.utexas.edu](mailto:ymtorres@mail.utexas.edu) for information on the website or Dave Sullivan at [sullivan231@mail.utexas.edu](mailto:sullivan231@mail.utexas.edu) with questions about the monitoring data and analyses in this report.

## **1.0 Introduction**

This report is jointly funded by Cheniere Energy and Gulf Coast Growth Ventures LLC (GCGV) as part of their separate Gregory-Portland community air-monitoring programs. This report includes reviews and analyses conducted by The University of Texas at Austin (UT) of the air monitoring data obtained at the three stations since their continuous monitoring operations began. UT established the Gregory Fresno (GF) station for Cheniere Energy and has managed the station since continuous monitoring operations began on October 1, 2019. AECOM, an engineering company, established the Portland Buddy Ganem (PBG) and Portland Broadway (PBway) stations for GCGV and has managed the stations since continuous monitoring operations began on January 1, 2020. The primary emphasis in this report is the examination of data collected and validated for the period January 1 to December 31, 2024, with some comparisons to earlier data.

## **2.0 Summary of Activities January 1 through December 31, 2024**

The data completeness acceptable minimum for regulatory monitoring of criteria air pollutants is 75 percent. These three non-regulatory air monitoring stations have generally reported quality assured data at a greater than 75% data completeness.

As was noted in recent quarterly reports, the GCGV ethane-cracking and derivatives facility has been fully operational since January 2022. Operations at the GCGV facility and the Cheniere Energy facility do not appear to have affected the level of pollutants measured at project stations.

This report focuses on the data collected at the three air monitoring stations during the period January 1 through December 31, 2024, but also includes some summaries from earlier monitoring.

## **3.0 Air Monitoring Station Locations & Information**

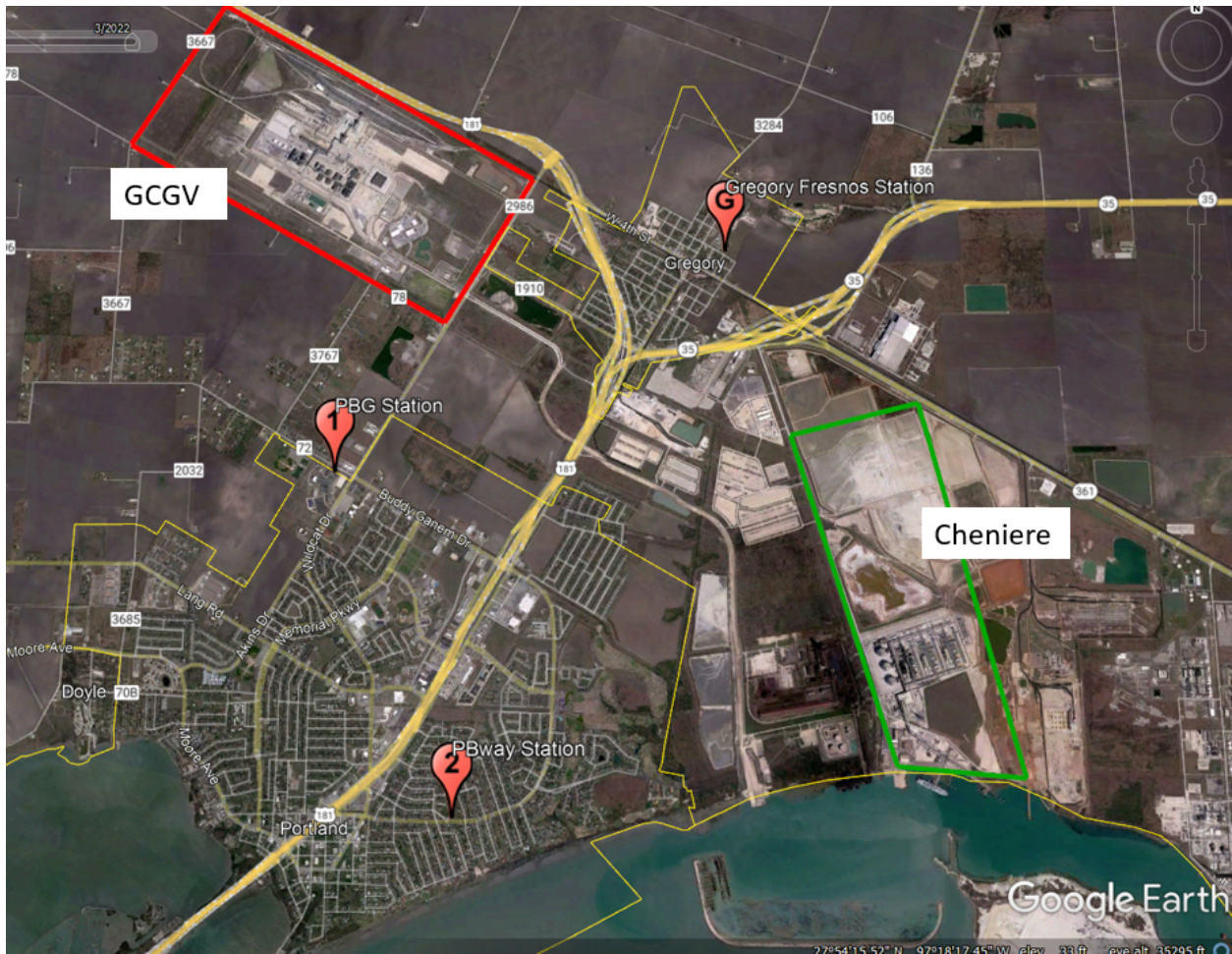
As noted earlier in this report, there are three air monitoring stations in the Gregory-Portland area in operation, one station operated by UT in Gregory, TX and two operated by AECOM in Portland, TX. The locations of the three stations and parameters measured are summarized in Table 1. The locations of the three stations are shown in satellite view in Figure 1<sup>1</sup>. Also shown in Figure 1 are the locations of the Cheniere liquefied natural gas facility and the GCGV ethane-cracking and derivatives facility.

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<sup>1</sup> This image date March 2022; more recent images show too many clouds blocking views of the surface.

**Table 1. Gregory-Portland Community Air Monitoring Stations and Parameters Measured**

Air Monitoring Station Name & Address	Volatile Organic Compounds (VOCs) compounds	Ethylene oxide (EtO) 24 hr canister every 6 <sup>th</sup> day	Nitrogen Oxides (NO <sub>x</sub> , NO, & NO <sub>2</sub> )	Sulfur Dioxide (SO <sub>2</sub> )	Particulate Matter (PM) Mass, particles < 2.5 micron diameter	Wind Speed (WS), Wind Direction (WD), Ambient Temperature (T), Relative Humidity (RH), & Barometric Pressure (BP)
Gregory Fresno Stephen Austin Elementary 401 Fresno St. Gregory, TX	Yes	No	Yes	Yes	Yes	Yes
Portland Buddy Ganem 307 Buddy Ganem St. GP High School Portland, TX	Yes	Yes	No	No	Yes	Yes. + precipitation
Portland Broadway 175 Broadway Blvd. Old East Cliff Elementary School Portland, TX	Yes	Yes	No	No	Yes	Only WS, WD

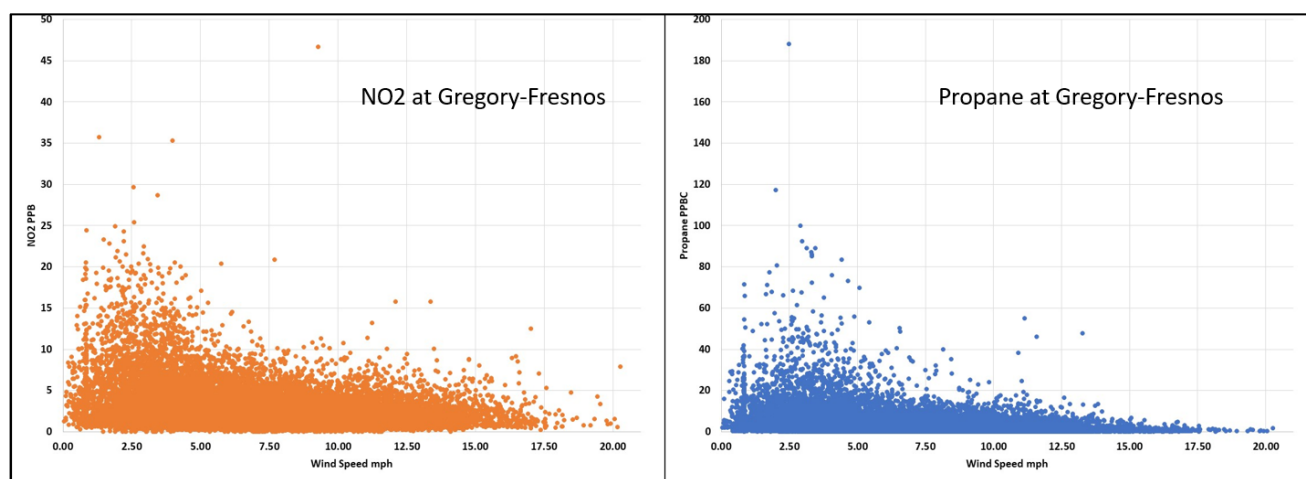


**Figure 1. Location of Gregory-Fresnos Community Air Monitoring Station (GF, pin G), and two Portland community stations on GPISD campuses on Buddy Ganem (PBG, pin 1) and on Broadway (PBWay, pin 2) and the Cheniere Energy and GCGV industrial facilities**

**4.0 Summary of Measurement Data**

As described in each report, the reader is reminded that pollutant concentrations are affected by several factors. One, of course, is the emission of a gas or smoke from an emission source or the availability of dust to become airborne. Another is the weather. Regarding weather, rain can reduce concentrations of several pollutants, especially particulate matter. The “mixing height” is the lower level of the atmosphere wherein gases and particles mix vertically. Temperature inversions such as those experienced at night have low mixing heights and can lead to air pollutants emitted near the surface being trapped at lower altitudes, thus allowing concentrations to increase. The converse is midday periods when the mixing height of the lower atmosphere rises, and air pollutants are diluted in a larger volume of air. The wind plays a significant role in moving air pollutants from an emission source to other locations. For this reason, a large majority of air monitoring stations operated by the TCEQ and all three Gregory-Portland stations measure wind speed and wind direction. Under high wind speeds, many gas pollutants are dispersed and diluted; however, under high-speed winds, dust on the surface can be picked up and transported, leading to higher particulate concentrations. Higher speed winds passing over the roof of a storage tank can lower the atmospheric pressure on that roof, leading to vapors being drawn out of the tank and into the air. However, in general, low speed winds often lead to

higher concentrations of pollutants. Figure 2 shows how higher concentrations of NO<sub>2</sub> and propane at the GF station are associated with low-speed winds, with lower concentrations under higher speed winds. Winds can be thought of as being local – near the surface – and regional – at higher altitudes. The local wind direction affects pollutant concentrations in terms of whether a pollution source is in the upwind direction, or along the local upwind path of the air if wind directions are changing. Similarly, but on a larger scale, the regional wind direction affects pollutant concentrations in terms of whether or not a source such as another major city, a large power plant, a forest fire, etc., is along the regional upwind path of the air. In the graphs that follow, some short-term concentration measurements are significantly higher than the balance of the data. In some cases, this is likely the combination of emission and meteorological (Met) factors, and in other cases, normal emissions can result in unusually high concentrations owing to a source being nearby under low wind speeds or air stagnation.



**Figure 2. Effect of wind speed on primary pollutants**

Please note that the measurement data in this report are quality assured station data made available at different submission frequencies:

- NO<sub>x</sub>, NO, & NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>2.5</sub> & Met measurements – weekly;
- Auto-GC VOC measurements – generally within 60 days of the measurement; and
- EtO canister data – generally within 60 days of the date the sample was collected.

Although all these measurements, except EtO, are made in near-real time, the nature of the complexity in quality assuring the auto-GC target hydrocarbons among the thousands of different organic compounds that exist in the air leads to a lengthy delay in releasing the quality assured target species data. Air samples for EtO data are collected at the station and then sent to a laboratory where EtO concentrations are then derived upon analysis of the air samples. Hence, the data available at the time this report was written will not all have the same date ranges. For this report, auto-GC and EtO data are available through October 31, 2024, and all other data were available through December 31, 2024.

#### **4.1 Gregory Fresnos Station Hydrocarbon Data**

Figure 3 shows the time series graph for hourly concentrations of benzene at the Gregory-Fresnos (GF) station in 2024. The graph shows benzene hourly average concentrations for each hour from January 1, 2024, through October 31, 2024 (10 months). The date and concentration of the highest value in the graph is shown in the graph. Benzene concentrations in the air can be

of health concern but to date their concentrations have been much lower than TCEQ Air Monitoring Comparison Values (AMCV) of 1,080 ppbC for a single one-hour value or 8.4 ppbC for an annual hourly average concentration. Other AMCVs for auto-GC hydrocarbons can be found at [https://www.tceq.texas.gov/cgi-bin/compliance/monops/agc\\_amcvs.pl](https://www.tceq.texas.gov/cgi-bin/compliance/monops/agc_amcvs.pl) (accessed January 2025). Note that a straight line or a gap in a time series graph represents missing data. Data may be missing owing to equipment failure, planned equipment or site maintenance, or external factors such as power loss or severe weather.

Table 2 lists all target hydrocarbon species measured and reported by the GF auto-GC, with the peak one-hour concentration, maximum 24-hour day concentration, and the January through October 2024 average hourly concentration for each species. Note that the total sum of the target species (TNMTC) and the total sum of the hydrocarbons (target species plus non-target species and unknown species) (TNMHC) are included in the table. In addition, the TCEQ's Air Monitoring Comparison Values (AMCV) are shown in the table. From the TCEQ's Air Monitoring Comparison Values website<sup>2</sup>:

“AMCVs are used to evaluate the potential for effects to occur as a result of exposure to concentrations of constituents in the air. AMCVs are based on data concerning health effects, odor, and vegetation effects. They are not ambient air standards. If predicted or measured airborne levels of a constituent do not exceed the comparison level, adverse health or welfare effects would not be expected to result. If ambient levels of constituents in air exceed the comparison levels, it does not necessarily indicate a problem, but rather, triggers a more in-depth review. If you have any questions about the potential for health, odor, or vegetation effects from exposure to reported concentrations of any of these compounds, please contact the Toxicology Division by telephone at (512) 239-3900 or by email at [tox@tceq.texas.gov](mailto:tox@tceq.texas.gov).”

Data completeness for auto-GCs is based on the planned collection of 22 hours per day – as two hours per day are reserved for quality assurance activities. The GF station has collected data on the individual hydrocarbon compounds with 80 to 86 percent data completeness of the planned collection hours for the first 10 months of 2024.

Time series graphs of other hydrocarbon species are also available upon request and any graphs can be made with timescale (x-axis) or concentration-scale (y-axis) adjustments. Also, concentrations can be averaged by day, month, or other time period upon request. A user can also make graphs of data on the project website at <https://gpair.ceer.utexas.edu/custom-data-request.php> (accessed January 2025). To make a request, contact Dr. Dave Sullivan at [sullivan231@mail.utexas.edu](mailto:sullivan231@mail.utexas.edu) or 512-914-4710.

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<sup>2</sup> [https://www.tceq.texas.gov/cgi-bin/compliance/monops/agc\\_amcvs.pl](https://www.tceq.texas.gov/cgi-bin/compliance/monops/agc_amcvs.pl) accessed January 2025.



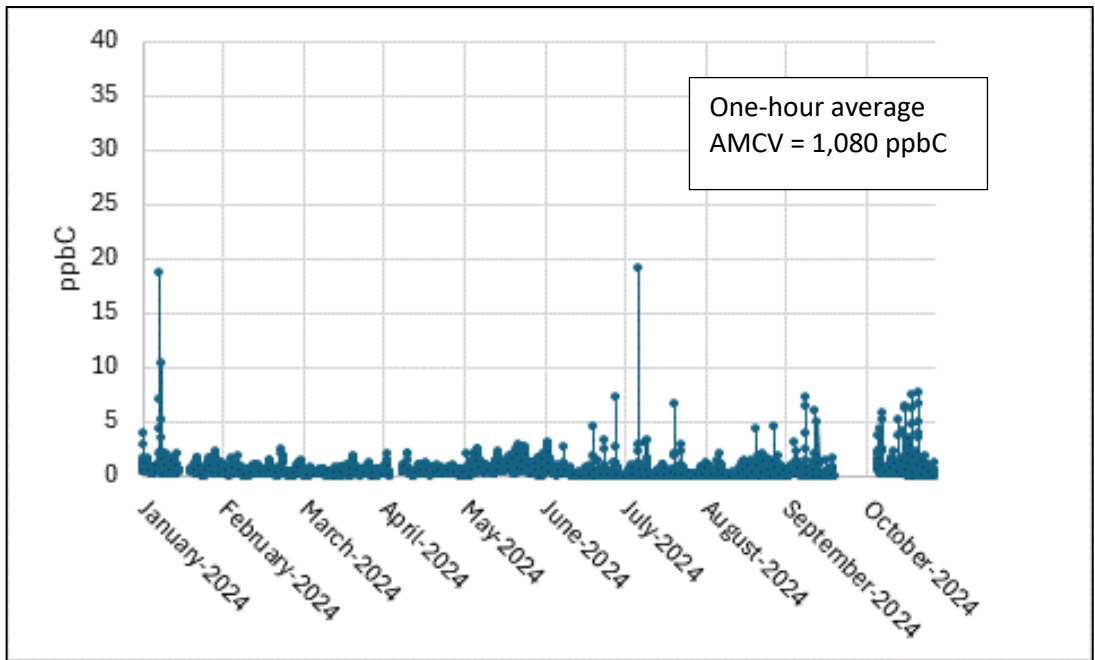


Figure 3. Hourly benzene concentrations at GF station, Jan. 1, 2024 – Oct. 31, 2024, ppbC units

**Table 2. Gregory-Fresnos Auto-GC statistics for Jan. – Oct. 2024**

Species	Num. Samples	Peak 1-hr ppbC	Peak 24-hr ppbC	Short-term AMCV	Mean ppbC	Long-term AMCV
TNMHC	5,759	2,192.23	385.57	N/A	47.30	N/A
TNMTC	5,759	2,052.42	370.82	N/A	43.42	N/A
Ethane	5,759	648.14	125.03	N/A	12.00	N/A
Ethylene	5,759	377.16	17.54	1,000,000	0.84	10,600
Propane	5,759	469.94	91.10	N/A	9.17	N/A
Propylene	5,759	13.25	2.81	N/A	0.76	N/A
Isobutane	5,759	222.23	40.11	132,000	3.26	40,000
n-Butane	5,759	516.52	51.27	368,000	5.42	40,000
Acetylene	5,684	450.54	20.81	50,000	0.55	5,000
trans-2-Butene	5,759	462.34	21.14	60,000	0.25	2,800
1-Butene	5,759	5.22	0.52	108,000	0.19	9,200
cis-2-Butene	5,759	22.83	1.80	60,000	0.09	2,800
Cyclopentane	5,759	67.74	3.62	29,500	0.16	2,950
Isopentane	5,759	218.96	21.80	340,000	2.77	40,500
n-Pentane	5,759	260.70	23.31	340,000	2.23	40,500
1,3-Butadiene	5,759	210.38	12.29	6,800	0.13	36
trans-2-Pentene	5,759	156.80	7.15	60,000	0.06	2,800
1-Pentene	5,759	14.71	1.04	60,000	0.05	2,800
cis-2-Pentene	5,759	3.33	0.40	60,000	0.02	2,800
2,2-Dimethylbutane	5,759	5.93	1.09	32,400	0.13	1,140
Isoprene	5,759	13.31	0.79	7,000	0.12	700
n-Hexane	5,758	93.45	8.20	32,400	0.90	1,140
Methylcyclopentane	5,759	45.96	3.85	4,500	0.41	450
2,4-Dimethylpentane	5,759	77.75	3.53	58,100	0.03	15,400
Benzene	5,759	36.42	2.02	1,080	0.37	8.4
Cyclohexane	5,759	45.83	4.01	6,000	0.42	600
2-Methylhexane	5,759	19.01	1.22	58,100	0.11	15,400
2,3-Dimethylpentane	5,759	41.98	2.00	58,100	0.05	15,400
3-Methylhexane	5,759	14.68	1.28	58,100	0.18	15,400
2,2,4-Trimethylpentane	5,759	16.08	1.49	32,800	0.20	3,040
n-Heptane	5,758	30.47	2.29	58,100	0.27	15,400
Methylcyclohexane	5,759	48.69	3.60	28,000	0.42	2,800
2,3,4-Trimethylpentane	5,759	21.80	1.00	32,800	0.03	3,040
Toluene	5,759	94.72	7.78	28,000	0.51	7,700
2-Methylheptane	5,759	12.15	0.65	32,800	0.06	3,040
3-Methylheptane	5,759	9.92	0.51	32,800	0.05	3,040
n-Octane	5,759	15.78	0.90	32,800	0.13	3,040
Ethyl Benzene	5,759	4.62	0.83	160,000	0.05	3,520
p-Xylene + m-Xylene	5,759	8.21	1.00	13,600	0.21	1,120
Styrene	5,759	0.83	0.31	41,600	0.01	880
o-Xylene	5,759	2.69	0.27	13,600	0.06	1,120
n-Nonane	5,759	7.59	0.51	27,000	0.06	2,520
Isopropyl Benzene -	5,759	0.57	0.05	4,590	0.01	459
n-Propylbenzene	5,759	1.29	0.23	4,590	0.02	459
1,3,5-Trimethylbenzene	5,407	1.48	0.12	27,000	0.01	333
1,2,4-Trimethylbenzene	5,383	2.60	0.66	27,000	0.22	333
n-Decane	5,407	6.16	0.57	10,000	0.07	1,900
1,2,3-Trimethylbenzene	5,407	1.79	0.33	27,000	0.04	333

#### 4.2 Portland Buddy Ganem & Portland Broadway Stations Hydrocarbon Data

Figure 4 shows the time series graph for hourly concentrations of benzene at the Portland Buddy Ganem (PBG) station, and Figure 5 shows the time series graph for the hourly concentrations of benzene at the Portland Broadway (PBway) station. Both graphs show benzene hourly average concentrations for each hour from January 1, 2024, through October 31, 2024.

As was the case at the Gregory Fresnos station, hydrocarbon concentrations to date are much lower than the TCEQ AMCVs. Table 3 lists the target hydrocarbon species measured and reported by the Portland Buddy Ganem (PBG) auto-GC and Table 4 lists the target hydrocarbon species measured and reported by the Portland Broadway (PBway) auto-GC with the peak one-hour concentration, maximum 24-hour day concentration, and average hourly concentration for each species for January through October 2024. Also shown in the two tables are the TCEQ's AMCVs.

Based on the 22 hours per day planned ambient measurements, the PBG station has collected data with a 86 to 90 percent data completeness based on planned collection hours for the first ten months of 2024, except for data completeness for Acetylene, at 63 percent. The PBway station has between 92 and 94 percent data completeness of the planned collection hours over the first ten months of 2024, except for a lower 48 percent data completeness for Acetylene. Acetylene and some other C2 (2-carbon) compounds often have measurement difficulties.

Time series graphs of other hydrocarbon species are also available upon request, and any graphs can be made with timescale (x-axis) or concentration-scale (y-axis) adjustments. In addition, concentrations can be averaged by day, week, or month upon request. As mentioned earlier in the report, a user can also make graphs on the project website.

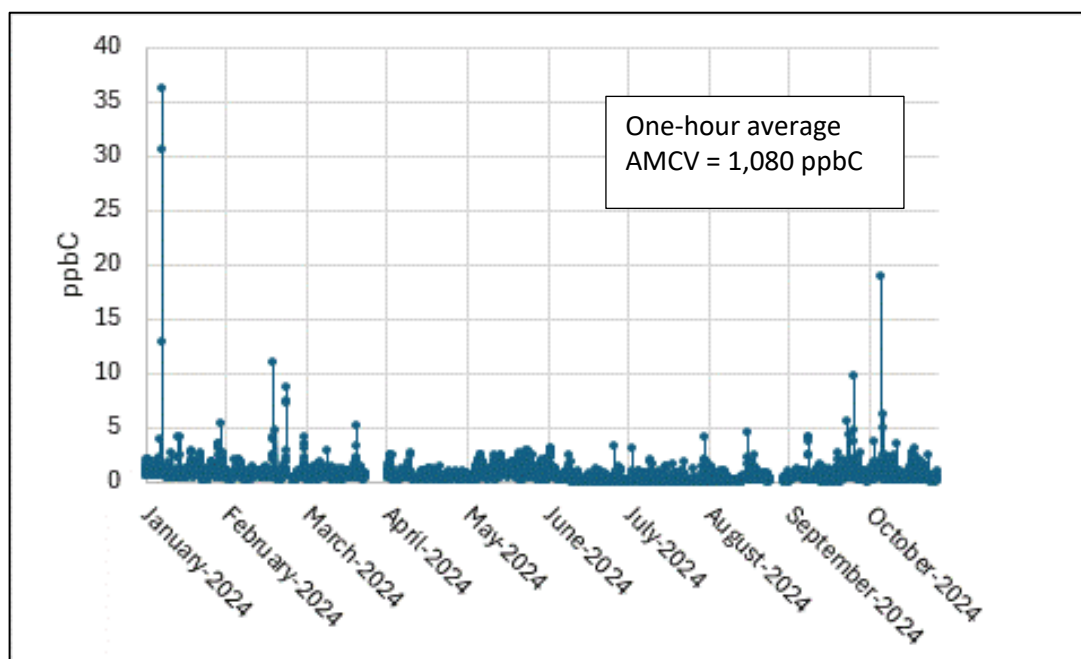
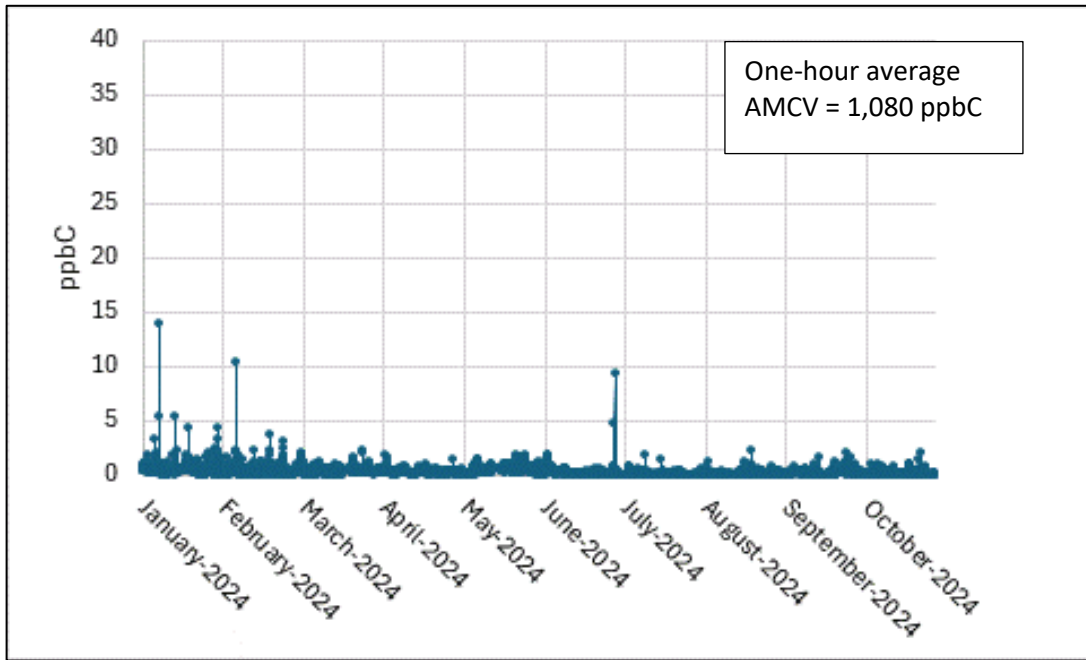


Figure 4. Hourly benzene concentrations at PBG station, Jan. 1, 2024 – Oct. 31, 2024, ppbC units



**Figure 5. Hourly benzene concentrations at PBway station, Jan. 1, 2024 – Oct. 31, 2024, ppbC units**

**Table 3. PBG Auto-GC statistics for Jan. – Oct. 2024**

Species	Num. Samples	Peak 1-hr ppbC	Peak 24-hr ppbC	Short-term AMCV	Mean ppbC	Long-term AMCV
TNMHC	6,003	2,310.57	243.94	N/A	47.62	N/A
TNMTC	6,003	2,260.86	230.47	N/A	43.98	N/A
Ethane	6,003	2,157.00	115.82	N/A	14.25	N/A
Ethylene	6,003	88.50	6.01	1,000,000	1.10	10,600
Propane	6,003	291.00	54.69	N/A	8.40	N/A
Propylene	6,003	13.60	2.00	N/A	1.06	N/A
Isobutane	6,003	156.00	25.24	132,000	2.54	40,000
n-Butane	6,003	258.00	34.07	368,000	4.95	40,000
Acetylene	4,243	9.60	1.31	50,000	0.41	5,000
trans-2-Butene	6,001	0.99	0.19	60,000	0.08	2,800
1-Butene	5,961	3.70	0.47	108,000	0.21	9,200
cis-2-Butene	6,003	0.83	0.11	60,000	0.05	2,800
Cyclopentane	6,003	21.00	2.06	29,500	0.15	2,950
Isopentane	6,003	143.00	15.70	340,000	2.63	40,500
n-Pentane	6,003	207.00	20.65	340,000	2.20	40,500
1,3-Butadiene	6,002	11.80	0.64	6,800	0.06	36
trans-2-Pentene	5,897	2.60	0.21	60,000	0.03	2,800
1-Pentene	5,902	1.40	0.13	60,000	0.05	2,800
cis-2-Pentene	5,902	2.40	0.15	60,000	0.01	2,800
2,2-Dimethylbutane	5,902	4.60	0.44	32,400	0.06	1,140
Isoprene	5,902	2.90	0.78	7,000	0.23	700
n-Hexane	6,012	120.00	11.21	32,400	0.64	1,140
Methylcyclopentane	6,012	57.70	5.40	4,500	0.27	450
2,4-Dimethylpentane	6,012	9.90	0.88	58,100	0.01	15,400
Benzene	6,009	36.20	4.05	1,080	0.54	8.4
Cyclohexane	6,012	93.40	8.79	6,000	0.41	600
2-Methylhexane	6,012	22.00	2.13	58,100	0.15	15,400
2,3-Dimethylpentane	6,012	12.60	1.20	58,100	0.07	15,400
3-Methylhexane	6,011	35.60	3.37	58,100	0.21	15,400
2,2,4-Trimethylpentane	6,012	31.90	3.18	32,800	0.30	3,040
n-Heptane	6,004	66.20	6.38	58,100	0.34	15,400
Methylcyclohexane	6,012	119.00	11.25	28,000	0.50	2,800
2,3,4-Trimethylpentane	6,010	8.10	0.55	32,800	0.05	3,040
Toluene	6,012	58.60	5.36	28,000	0.74	7,700
2-Methylheptane	5,977	17.60	1.59	32,800	0.06	3,040
3-Methylheptane	5,977	13.20	0.81	32,800	0.04	3,040
n-Octane	5,977	30.50	2.90	32,800	0.20	3,040
Ethyl Benzene	5,977	12.00	1.06	160,000	0.10	3,520
p-Xylene + m-Xylene	5,977	58.60	4.78	13,600	0.35	1,120
Styrene	5,961	1.80	0.27	41,600	0.02	880
o-Xylene	5,961	20.80	1.50	13,600	0.08	1,120
n-Nonane	5,961	8.80	0.72	27,000	0.10	2,520
Isopropyl Benzene -	5,961	3.70	0.25	4,590	0.01	459
n-Propylbenzene	5,993	4.90	0.32	4,590	0.02	459
1,3,5-Trimethylbenzene	5,796	10.20	0.63	27,000	0.03	333
1,2,4-Trimethylbenzene	5,814	20.70	1.31	27,000	0.09	333
n-Decane	5,814	3.50	0.58	10,000	0.18	1,900
1,2,3-Trimethylbenzene	5,814	4.50	0.30	27,000	0.04	333

**Table 4. PBway Auto-GC statistics for Jan. – Oct. 2024**

Species	Num. Samples	Peak 1-hr ppbC	Peak 24-hr ppbC	Short-term AMCV	Mean ppbC	Long-term AMCV
TNMHC	6,147	2,906.38	290.81	N/A	38.64	N/A
TNMTC	6,147	2,747.68	277.36	N/A	35.61	N/A
Ethane	6,231	273.00	46.66	N/A	9.63	N/A
Ethylene	6,274	30.20	4.26	1,000,000	0.71	10,600
Propane	6,322	200.00	44.90	N/A	7.37	N/A
Propylene	6,150	16.20	3.11	N/A	0.90	N/A
Isobutane	6,322	431.00	31.33	132,000	2.47	40,000
n-Butane	6,322	1,084.00	74.64	368,000	5.09	40,000
Acetylene	3,188	20.10	2.23	50,000	0.40	5,000
trans-2-Butene	6,312	31.10	2.08	60,000	0.16	2,800
1-Butene	6,319	11.90	0.77	108,000	0.25	9,200
cis-2-Butene	6,322	12.20	0.77	60,000	0.07	2,800
Cyclopentane	6,322	8.70	1.39	29,500	0.40	2,950
Isopentane	6,322	523.00	34.17	340,000	2.70	40,500
n-Pentane	6,322	150.00	15.11	340,000	2.00	40,500
1,3-Butadiene	6,322	92.20	4.39	6,800	0.08	36
trans-2-Pentene	6,322	23.80	1.12	60,000	0.03	2,800
1-Pentene	6,320	24.30	1.22	60,000	0.07	2,800
cis-2-Pentene	6,318	8.40	0.38	60,000	0.01	2,800
2,2-Dimethylbutane	6,322	7.50	0.89	32,400	0.09	1,140
Isoprene	6,322	5.60	1.79	7,000	0.56	700
n-Hexane	6,285	57.60	4.80	32,400	0.37	1,140
Methylcyclopentane	6,285	27.00	2.07	4,500	0.18	450
2,4-Dimethylpentane	6,285	8.70	0.45	58,100	0.01	15,400
Benzene	6,285	13.90	1.39	1,080	0.23	8.4
Cyclohexane	6,285	36.80	2.89	6,000	0.26	600
2-Methylhexane	6,285	8.50	0.57	58,100	0.03	15,400
2,3-Dimethylpentane	6,285	7.60	0.43	58,100	0.02	15,400
3-Methylhexane	6,285	12.50	0.92	58,100	0.07	15,400
2,2,4-Trimethylpentane	6,285	22.70	1.68	32,800	0.18	3,040
n-Heptane	6,285	21.60	1.50	58,100	0.11	15,400
Methylcyclohexane	6,285	39.00	3.00	28,000	0.30	2,800
2,3,4-Trimethylpentane	6,285	5.30	0.40	32,800	0.03	3,040
Toluene	6,285	114.00	9.86	28,000	0.44	7,700
2-Methylheptane	6,285	3.60	0.29	32,800	0.02	3,040
3-Methylheptane	6,285	2.40	0.18	32,800	0.01	3,040
n-Octane	6,285	7.40	0.76	32,800	0.06	3,040
Ethyl Benzene	6,285	2.50	0.17	160,000	0.01	3,520
p-Xylene + m-Xylene	6,285	11.30	1.32	13,600	0.17	1,120
Styrene	6,285	0.73	0.26	41,600	0.01	880
o-Xylene	6,285	3.90	0.29	13,600	0.02	1,120
n-Nonane	6,285	17.50	0.86	27,000	0.03	2,520
Isopropyl Benzene -	6,285	2.20	0.11	4,590	0.01	459
n-Propylbenzene	6,284	2.00	0.15	4,590	0.01	459
1,3,5-Trimethylbenzene	6,284	4.50	0.21	27,000	0.01	333
1,2,4-Trimethylbenzene	6,283	5.90	0.69	27,000	0.12	333
n-Decane	6,285	30.90	1.54	10,000	0.05	1,900
1,2,3-Trimethylbenzene	6,285	1.10	0.19	27,000	0.02	333

### 4.3 Ethylene Oxide Measurements

As was noted earlier in this report, the GCGV ethane-cracking and derivatives facility began operating in late 2021 through early 2022. As shown in Figure 6 through Figure 9, the levels of EtO measured at the two GCGV stations have remained low, with no discernable trends. Note that values of 0.0 ppbC were recorded from the laboratory as non-detects. The TCEQ effects screening level (ESL) and Air Monitoring Comparative Value (AMCV) for chronic exposure to EtO is 2.4 ppbV or 4.8 ppbC. The terms AMCV and ESL are defined in Appendix A.2. (<https://www.tceq.texas.gov/downloads/toxicology/dsd/final/eto.pdf>, accessed January 2025). It is notable that there has been no change in concentrations over the past three years while the GCGV industrial facility has been in operation. In fact, there has been an increased frequency of non-detects over time.

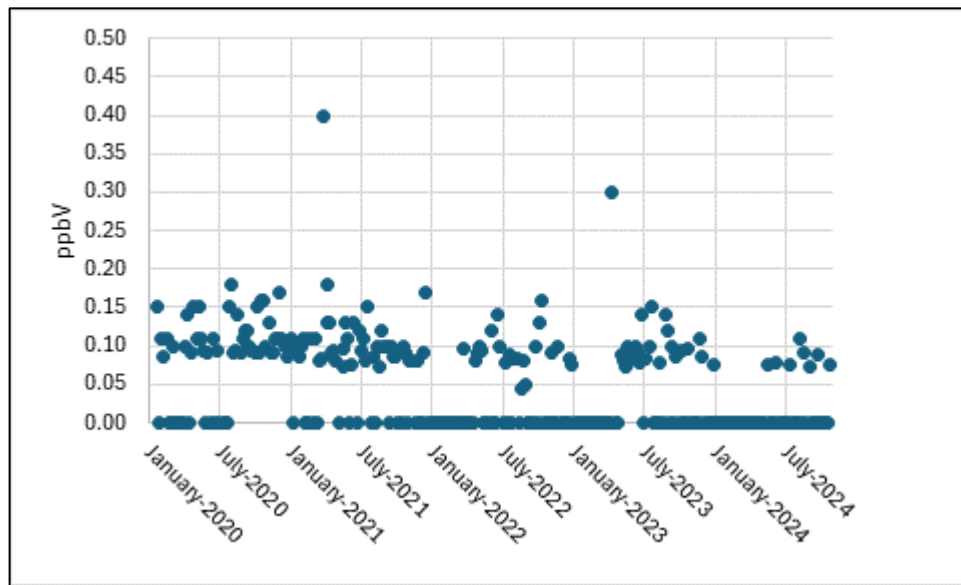
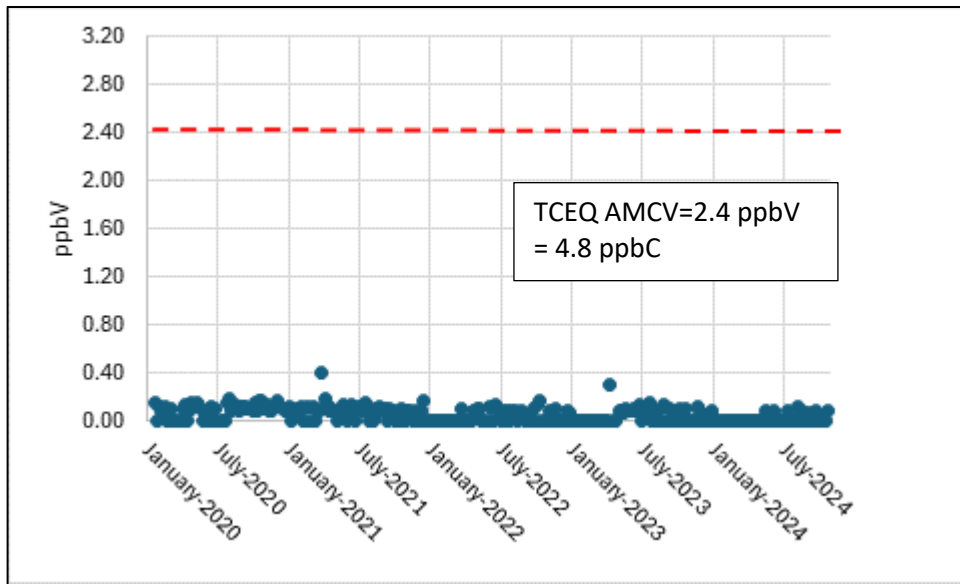
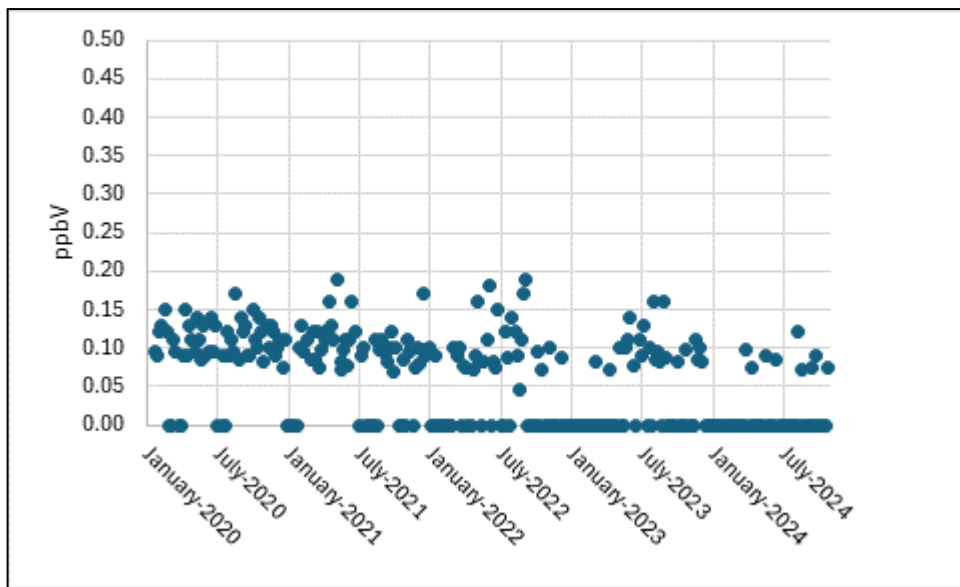


Figure 6. PBG EtO concentrations, every 6<sup>th</sup> day samples Jan. 2020 through Oct. 2024

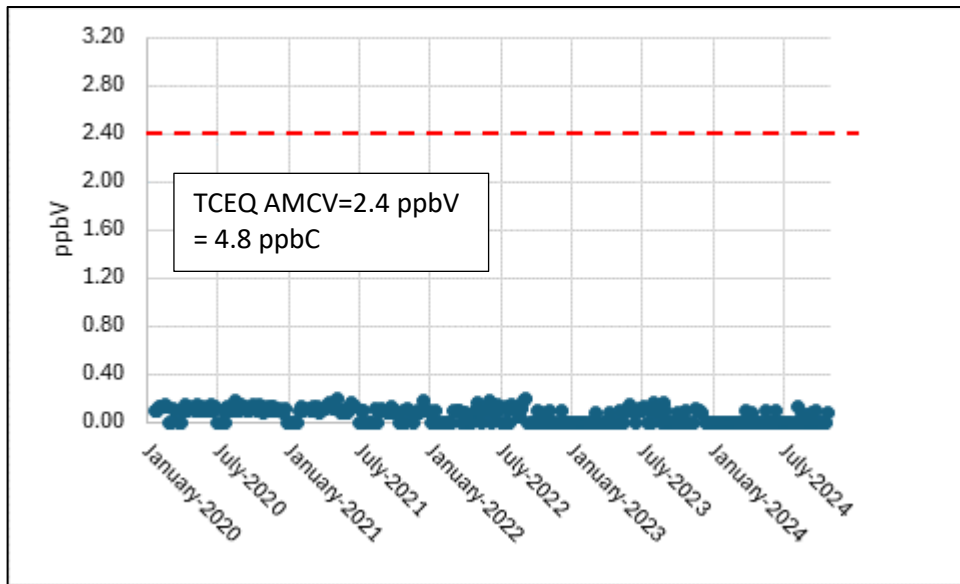


**Figure 7. PBG EtO concentrations, every 6<sup>th</sup> day samples Jan. 2020 through Oct. 2024 in comparison to TCEQ Air Monitoring Comparative Value**



**Figure 8. PBway EtO concentrations, every 6<sup>th</sup> day samples Jan. 2020 through Oct. 2024**





**Figure 9. PBway EtO concentrations, every 6<sup>th</sup> day samples Jan. 2020 through Oct. 2024 in comparison to TCEQ Air Monitoring Comparative Value**

#### 4.4 Comparing Hydrocarbon Data between Stations

Figure 10 shows a bar graph comparison between the average concentrations for the first ten months of 2024 of the hydrocarbons measured by auto-GC, including TNMTC and TNMHC, at the three stations. The graph shows relatively close correlation among the three stations.

Figure 11 is a similar graph excluding TNMTC and TNMHC. This second graph allows for a better comparison of the similarity among the stations. The most common nonmethane hydrocarbons in the atmosphere in urban areas are ethane and propane, followed by other alkane species such as butanes and pentanes. These species have low chemical reactivities and thus can persist in the air longer than more reactive species. Some ethane and propane are likely transported into the region from nearby oil and gas extraction fields.

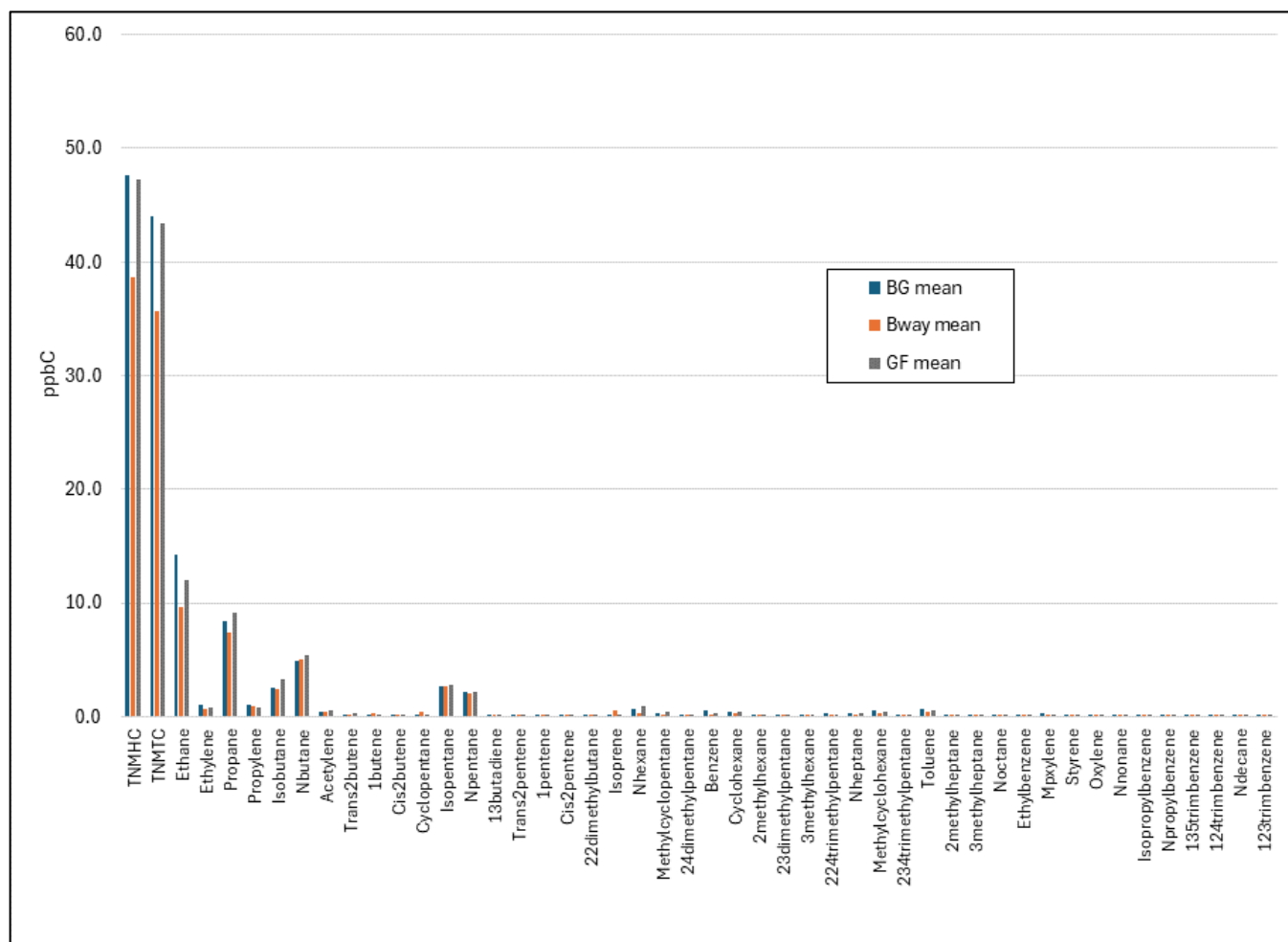
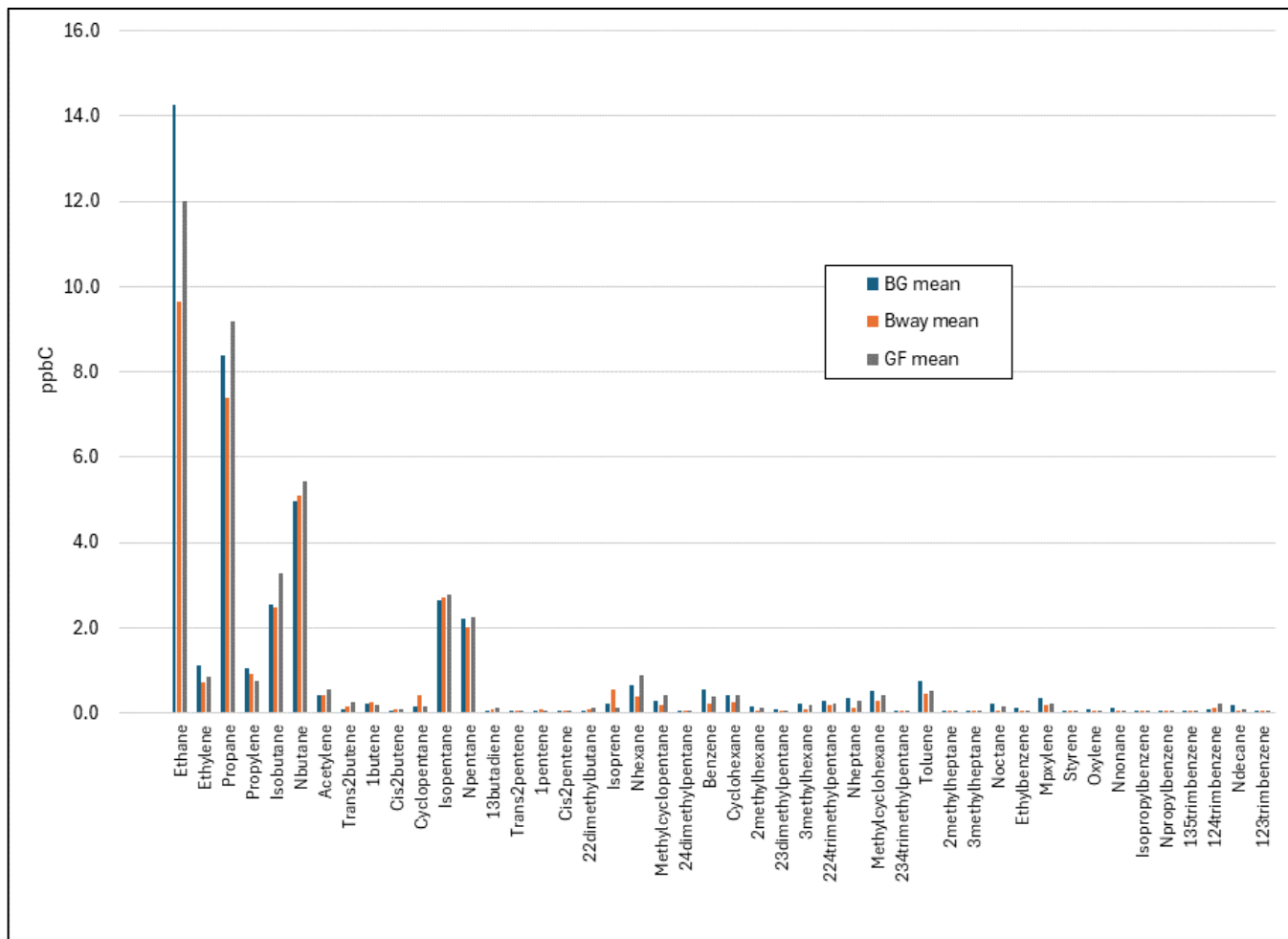


Figure 10. January through October 2024 mean concentrations of TNMTC, TNMHC, and hydrocarbon species at three stations.



**Figure 11. January through October 2024 mean concentrations of hydrocarbon species at three air monitoring stations.**

#### 4.5 Gregory Fresno Station Criteria Pollutant Data

Sulfur dioxide (SO<sub>2</sub>), fine particulate matter (PM<sub>2.5</sub>), and nitrogen dioxide (NO<sub>2</sub>) are three pollutants measured at the GF site that are regulated by the U.S. Environmental Protection Agency (EPA). These pollutants, along with ozone, lead, combined coarse and fine particulate matter (PM<sub>10</sub>), and carbon monoxide are referred to as “criteria pollutants” and are governed by National Ambient Air Quality Standards (NAAQS). Some NAAQS are based on annual average concentrations, and some are based on the frequency with which very high concentrations are measured. The rationale is that different pollutants affect human health in different ways.

- PM<sub>2.5</sub> has both an annual average NAAQS and 24-hour NAAQS. For the PM<sub>2.5</sub> 24-hour NAAQS, the three-year average of the 98<sup>th</sup> percentile 24-hour (midnight to midnight, using standard time) concentration each year must be less than 35 micrograms per cubic meter (µg/m<sup>3</sup>). The annual average, averaged over three years, is calculated by first averaging 24-hour averages by quarter and then averaging the four quarters, must be less than 9 µg/m<sup>3</sup>.
- The NAAQS for NO<sub>2</sub> is for the one-hour values to average less than 53 ppb in a calendar year averaged over three years and for the three-year average of the 98<sup>th</sup> percentile daily maximum values to be less than 100 ppb.

- SO<sub>2</sub> has a 1-hour NAAQS, based on ranking the daily maximum one-hour values for each day in a year, selecting the 99<sup>th</sup> percentile daily maximum values, and then calculating a three-year average, which must be less than 75 ppb.

No concentrations at levels that violate the NAAQS have been seen at the GF station. Several recorded PM<sub>2.5</sub> one-hour values exceeded the level of the 24-hour NAAQS, 35 µg/m<sup>3</sup>, but as noted above, the NAAQS is not violated unless the 98<sup>th</sup> percentile of 24-hour averaged concentrations in a year, averaged over three years violates the 24-hour NAAQS, or unless the overall annual average, averaged over three years, exceeds the level of the annual NAAQS (9 µg/m<sup>3</sup>).

Figure 12 shows the 24-hour averaged daily PM<sub>2.5</sub> concentrations since the start of monitoring in October 2019. This graph is provided to illustrate the roughly seasonal pattern of PM<sub>2.5</sub>, with higher concentrations in the summers associated with transported dust from Northern Africa. The average concentration for 2024 was 8.7 µg/m<sup>3</sup>. Table 5 lists the annual mean PM<sub>2.5</sub> concentration from each of the past four years and the most recent three-year average for the GF station. The reader is cautioned that the Clean Air Act allows state agencies to exclude some days from NAAQS calculation, such as days affected by pollution that blows in from outside the boundaries of the United States. Examples include summer days when satellite imagery shows crustal material (e.g. sand) from the Sahara and Sahel Deserts in North and Central Africa has been picked by strong winds and transported across the Atlantic Ocean to reach the Texas Gulf Coast, or when smoke from agricultural burning in Southern Mexico or Central America is transported north under springtime southerly winds. In addition, the Clean Air Act allows exclusion of days on which special celebratory events such as Independence Day or New Years Day with fireworks contribute to elevated PM<sub>2.5</sub> levels. Thus, the values in this report will not necessarily match values that the U.S. EPA produces.

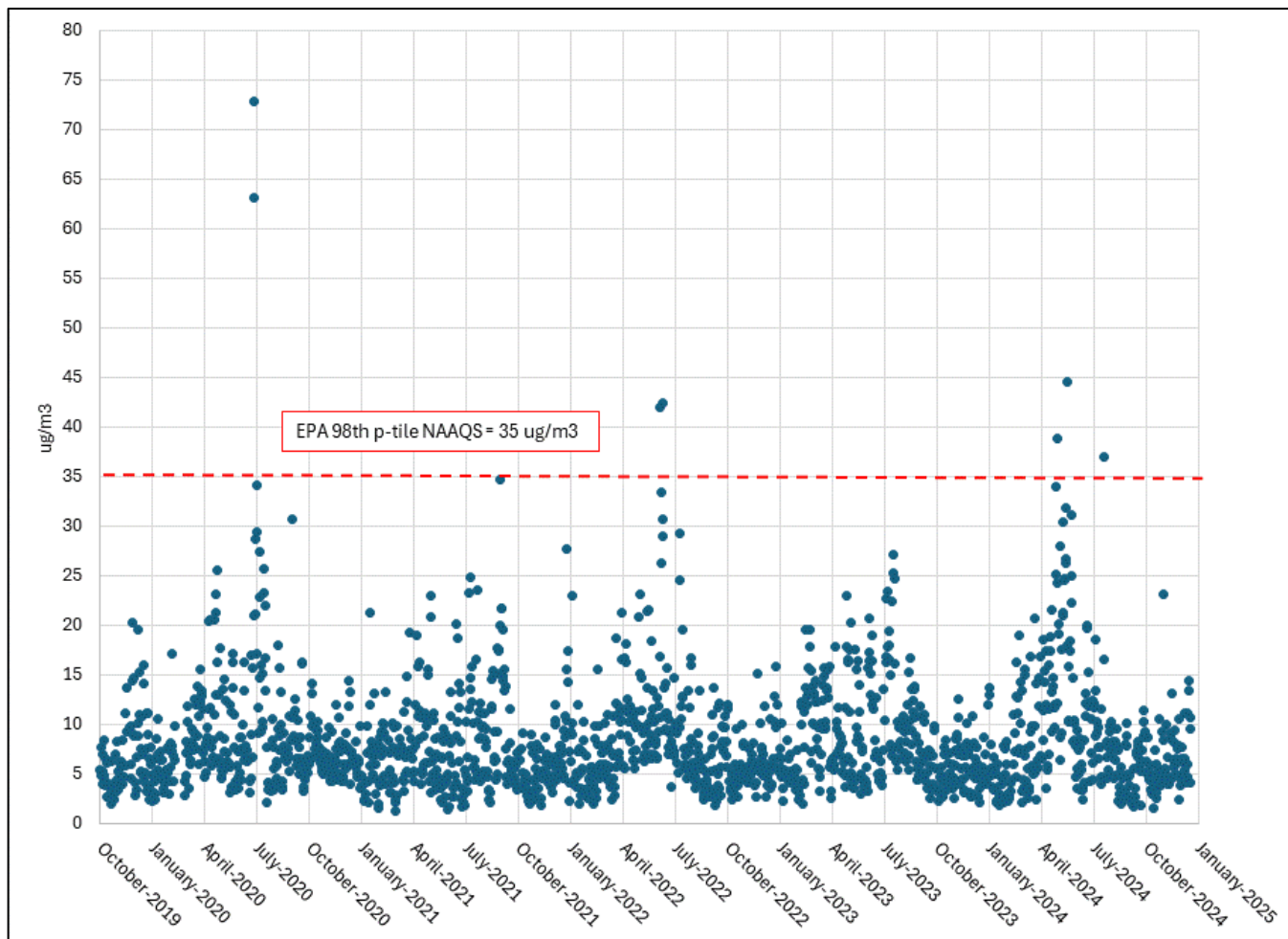


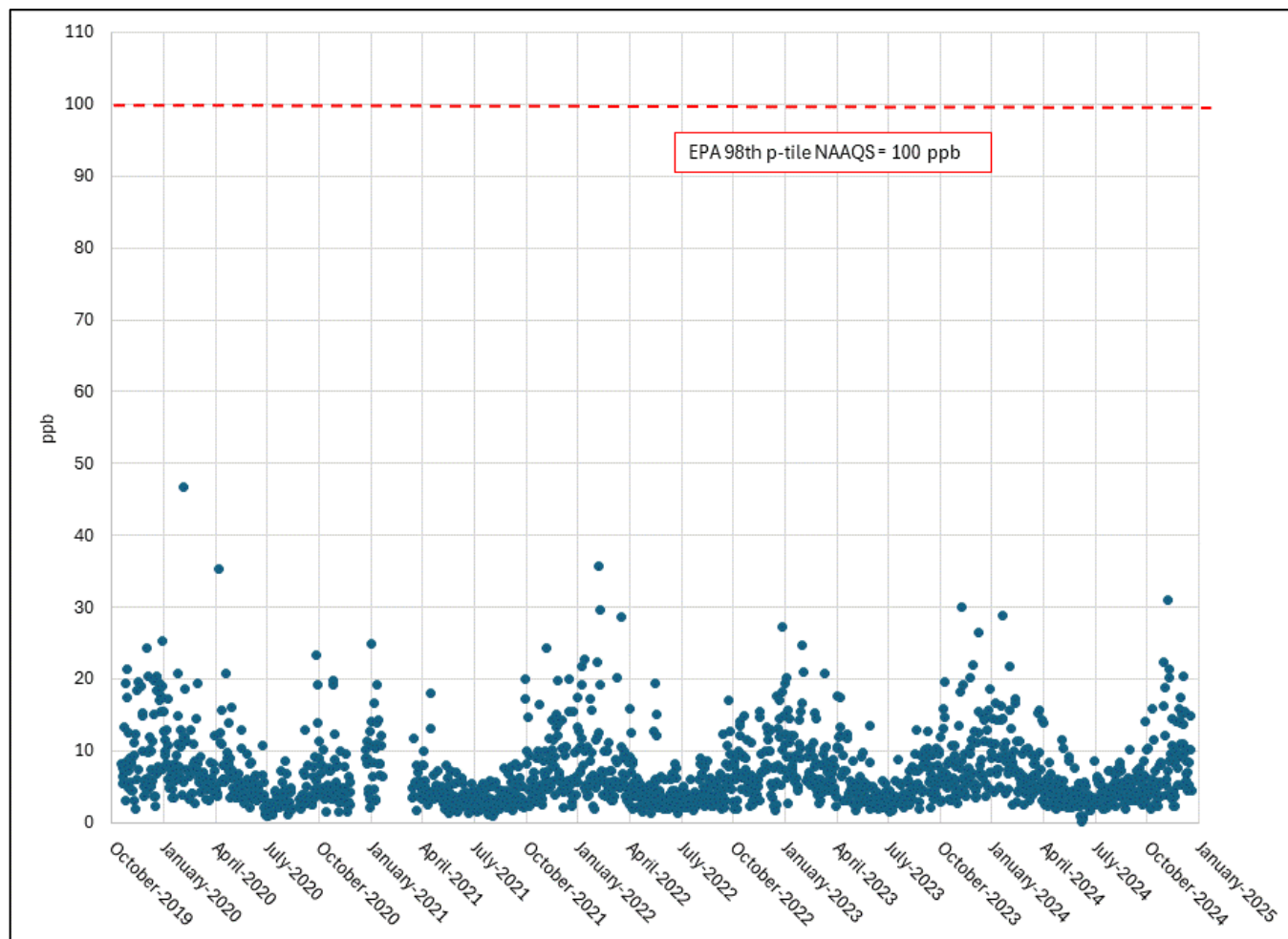
Figure 12. Averaged 24-Hour PM2.5 at GF, Oct. 1, 2019 – Dec. 31, 2024, with NAAQS

Table 5. GF PM2.5 annual means and three-year averages showing NAAQS compliance.

Year	Annual Mean $\mu\text{g}/\text{m}^3$	NAAQS 3-Year Annual Average Value, $\mu\text{g}/\text{m}^3$	Annual 98 <sup>th</sup> Percentile Value $\mu\text{g}/\text{m}^3$	NAAQS 3-Year 98 <sup>th</sup> Percentile Average Value, $\mu\text{g}/\text{m}^3$
2020	8.9		27.4	
2021	7.6		21.7	
2022	8.1		26.3	
2023	8.4		22.4	
2024	8.7		30.4	
2022-2024 3-year average	8.4	9.0	26.4	35.0

Figure 13 shows the hourly average time series graph for daily maximum NO<sub>2</sub> at the Gregory Fresno station from October 1, 2019, through December 31, 2024. The figure also shows the 24-hour 100 ppb NAAQS level. The figure shows measured concentrations have been well

below the level of the NAAQS. Table 6 lists for the past four years the NO<sub>2</sub> annual 98<sup>th</sup> percentile and the annual averages showing NAAQS compliance of these standards by large margins.

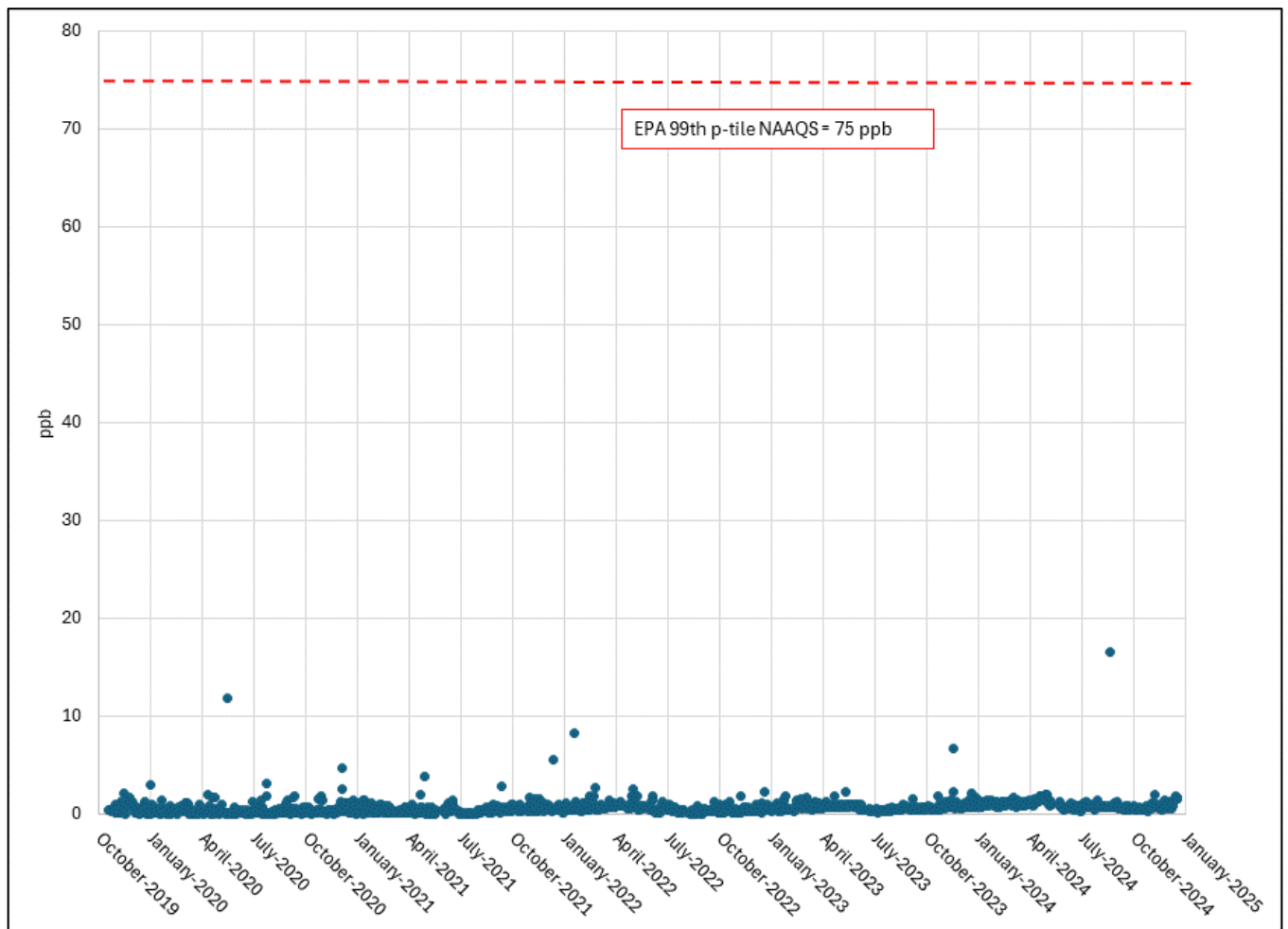


**Figure 13. Daily maximum NO<sub>2</sub> at GF, ppb units, Oct. 1, 2019 – Dec. 31, 2024, with NAAQS**

**Table 6. GF NO<sub>2</sub> annual 98<sup>th</sup> p-tile values, three-year mean showing NAAQS compliance.**

Year	Annual Average Values, ppb	NAAQS Annual Average Value, ppb	Annual 98 <sup>th</sup> percentile ppb	NAAQS 3-Year 98 <sup>th</sup> Percentile Average Value, ppb
2020	6.4	53	19.4	100
2021	5.7		18.5	
2022	6.5		19.7	
2023	7.3		20.6	
2024	6.7		20.2	
3-year Avg 2022-2024	6.8	53	20.2	100

SO<sub>2</sub> is rarely found in ambient air, and the SO<sub>2</sub> instruments are calibrated to accurately measure high concentrations that are a risk to public health. As a result, the large majority of SO<sub>2</sub> concentrations measurements are close to 0.0. Many instruments measuring low concentrations will produce time series with much scatter near 0.0 owing to the nature of carrying out the chemical or electrical reaction that is associated with the measurement and converting that to a number representing the concentration. When an instrument has been calibrated to accurately measure high concentrations to safeguard public health, generally at low concentrations near zero there can be high relative error. The time series graph for SO<sub>2</sub> since Oct. 2019 at the GF station is shown in Figure 14. The graph is scaled to illustrate how low the concentrations have been compared to the 75-ppb level of the NAAQS. Table 7 lists the annual 99<sup>th</sup> percentile values of daily maximum SO<sub>2</sub> for the past three complete years, again showing compliance between the level of the NAAQS and measured concentrations by more than 70 ppb.



**Figure 14. Daily maximum SO<sub>2</sub> at GF, Oct. 1, 2019 – Dec. 31, 2024, with NAAQS at 75 ppb**

**Table 7. GF SO<sub>2</sub> annual 99<sup>th</sup> percentile values of daily maximums three-year average showing NAAQS compliance.**

Year	Annual 99 <sup>th</sup> percentile ppb	NAAQS 99 <sup>th</sup> Percentile Average Value, ppb
2020	2.5	
2021	2.0	
2022	2.3	
2023	1.9	
2024	2.0	
3-year Avg. 2022 - 2024	2.1	75

**4.6 Portland Buddy Ganem & Portland Broadway Stations Criteria Pollutant Data**

Fine particulate matter (PM<sub>2.5</sub>) is the only NAAQS-regulated pollutant measured at the PBG and PBway stations. Figure 15 shows the 24-hour average concentrations at the PBG site from Jan. 2020 through December 2024, and Figure 16 shows the same time series for the PBway site. The 3-year average concentration PBG is 8.1 µg/m<sup>3</sup> and is 8.0 µg/m<sup>3</sup> at PBway. Table 8 and Table 9 summarize the average annual PM<sub>2.5</sub> concentrations for the PBG and PBway stations and the three-year average annual concentrations. As noted earlier in the report, one should view these data with caution, as U.S. EPA will adjust the annual and 3-year averages to remove special events and days with pollution originating outside the U.S. borders, as described below.

To a large extent, PM<sub>2.5</sub> concentrations are of a regional nature, in that transported dust or smoke, or locally formed aerosols generally affect a multi-county or larger area. As was the case with the GF station, there have been periods of elevated PM<sub>2.5</sub> in summer months associated with transported dust from Northern Africa. As we have reported in earlier reports, as an example of the regional nature of PM<sub>2.5</sub>, all three stations exceeded the 35 µg/m<sup>3</sup> 24-hour NAAQS on the same two dates, June 12, 2022, and June 16, 2022, owing to the transported North African dust, along with a large number of other PM<sub>2.5</sub> monitoring stations in Texas. Similarly, in 2024, all three Portland/Gregory stations had elevated PM<sub>2.5</sub> on May 8 and 9, owing to smoke from agricultural fires. On May 9, 2024, exceedances of the 24-hour NAAQS level of 35 µg/m<sup>3</sup> were recorded at all three Portland/Gregory stations, at several stations in the Houston/Galveston area, several in the Beaumont/Port Arthur area, one station in Austin, two stations in San Antonio, all three stations in Corpus Christi, and all four stations in the Lower Rio Grande Valley area. On July 31, 2024 all three Portland/Gregory stations had elevated PM<sub>2.5</sub>, and the TCEQ forecast North African dust reaching the Texas coast, and stations recorded exceedances of the 24-hour PM<sub>2.5</sub> NAAQS in the Lower Rio Grande Valley, Laredo, Corpus Christi, San Antonio, Austin, and Houston,



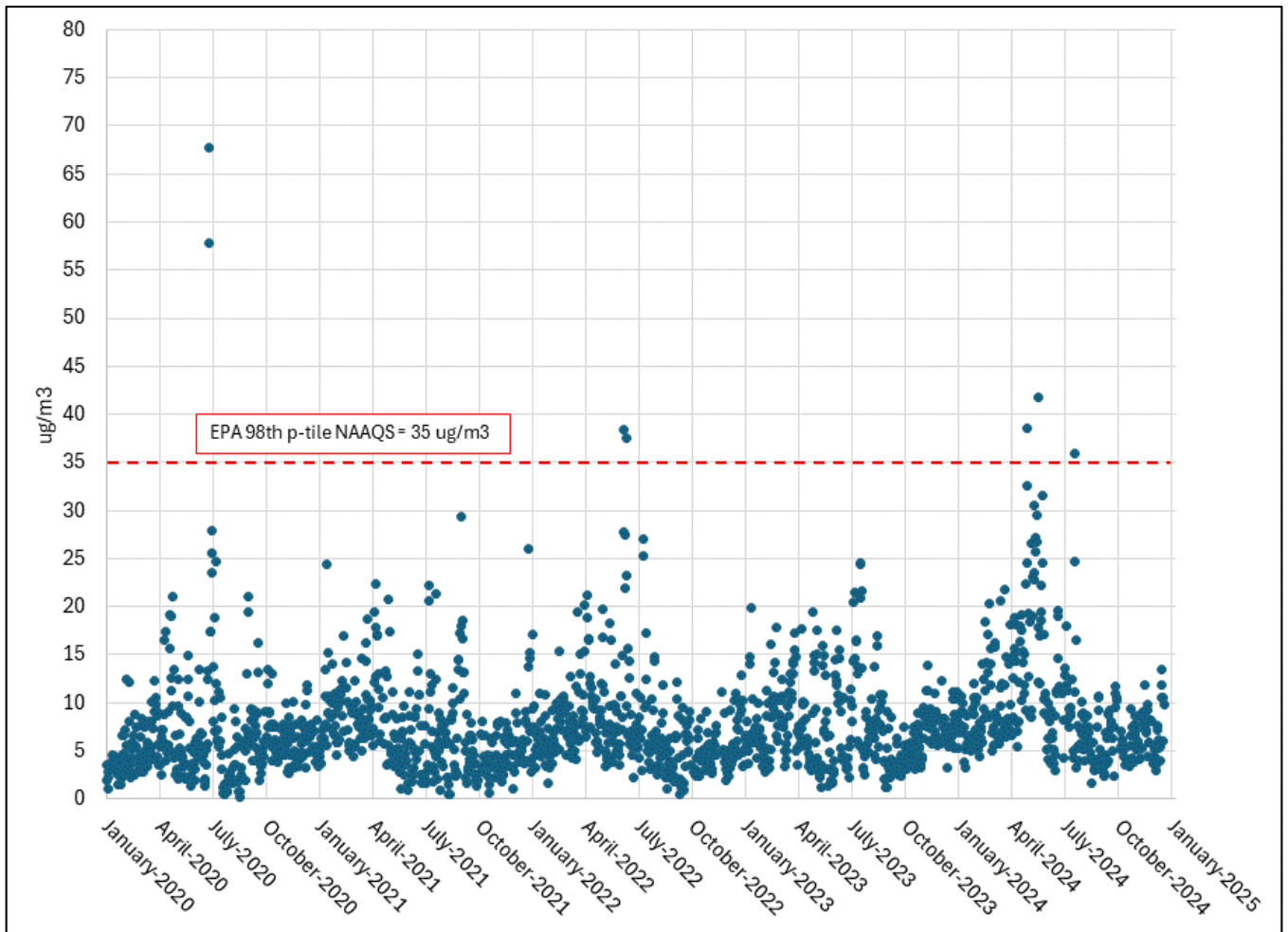


Figure 15. Mean 24-Hour PM2.5 at PBG, Jan. 1, 2020 – Dec. 31, 2024, NAAQS scale.

Table 8. PBG PM2.5 annual means and 3-year averages showing NAAQS compliance.

Year	Annual Mean $\mu\text{g}/\text{m}^3$	NAAQS 3-Year Annual Average Value, $\mu\text{g}/\text{m}^3$	Annual 98 <sup>th</sup> Percentile Value $\mu\text{g}/\text{m}^3$	NAAQS 3-Year 98 <sup>th</sup> Percentile Average Value, $\mu\text{g}/\text{m}^3$
2020	6.6		20.8	
2021	7.2		20.5	
2022	7.4		21.3	
2023	7.6		19.3	
2024	9.5		29.5	
3-year Avg. 2022-2024	8.1	9.0	23.3	35.0

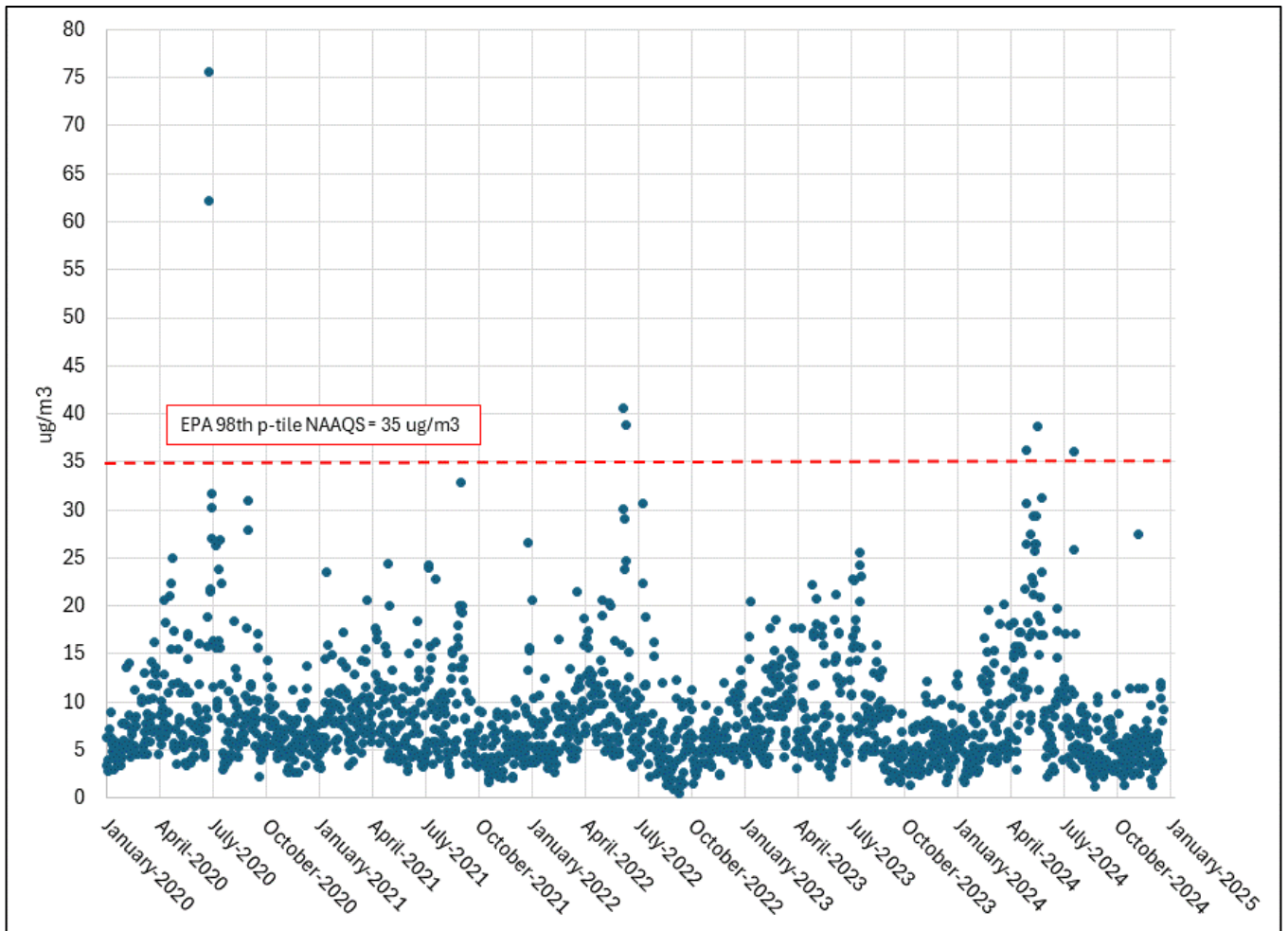


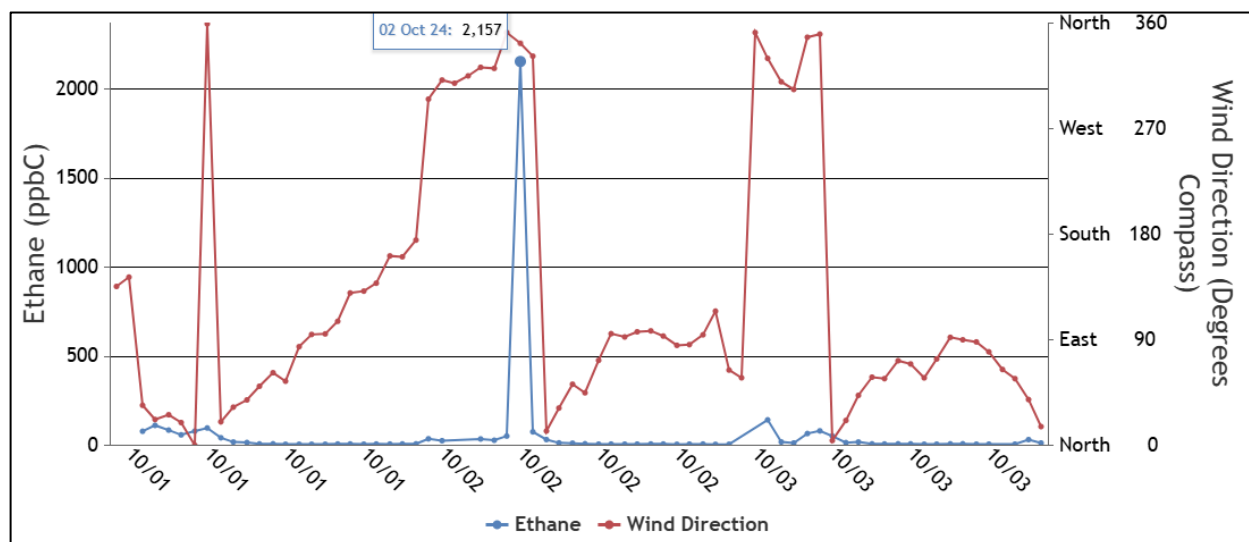
Figure 16. Mean 24-Hr PM2.5 at PBway, Jan. 1, 2020 – Dec. 31, 2024, with NAAQS value.

**Table 9. PBway PM2.5 annual means and 3-year averages showing NAAQS compliance.**

Year	Annual Mean $\mu\text{g}/\text{m}^3$	NAAQS 3-Year Annual Average Value, $\mu\text{g}/\text{m}^3$	Annual 98 <sup>th</sup> Percentile Value $\mu\text{g}/\text{m}^3$	NAAQS 3-Year 98 <sup>th</sup> Percentile Average Value, $\mu\text{g}/\text{m}^3$
2020	8.7		26.9	
2021	8.2		20.5	
2022	7.8		22.5	
2023	8.0		20.7	
2024	8.3		29.3	
3-year Avg. 2022-2024	8.0	9.0	24.1	35.0

### 5.0 Data Analysis

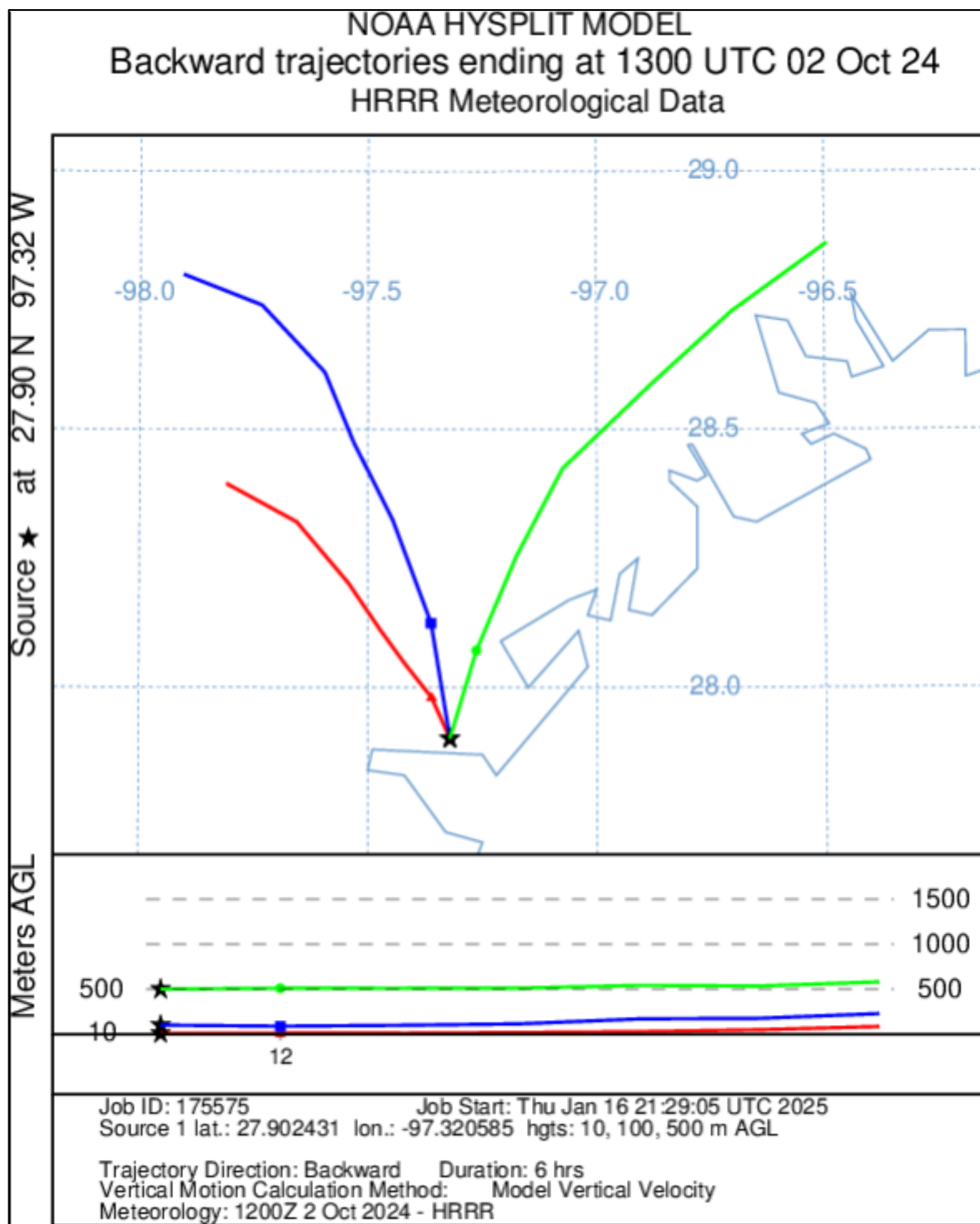
On October 2, 2024, the Buddy Ganem site recorded the highest ethane concentration to date at all three stations with 2,157 ppbC at 7 a.m. CST. Ethane is not a toxic substance and the TCEQ does not have an AMCV or ESL for it; however, it is a likely co-pollutant with methane, a greenhouse gas of some concern. Winds were northerly in the range of 4 to 7 miles per hour. No other hydrocarbon at that hour at PBG was measured with a concentration over 28 ppbC. That ethane value alone was 93 percent of the TNMHC and 95 percent of TNMTC concentrations. An examination of the TCEQ’s Upset Reports database did not show any reported emission events in the early October period in San Patricio or Nueces counties. A time series of ethane and wind direction at the Buddy Ganem site appears in Figure 17.



**Figure 17. Ethane and wind direction at the PBG station Oct. 1 – 3, 2024.**

As Figure 17 shows, the winds at the monitoring station were northerly at the time of the high value of ethane. An examination of winds using a back trajectory tool managed by the National

Oceanographic and Atmospheric Administration (NOAA) shows a range of upper air wind directions at different above ground altitudes, as shown in Figure 18. Also, unfortunately, neither of the other two stations were operating on October 2, 2024. Thus, the source of this high value remains unknown.

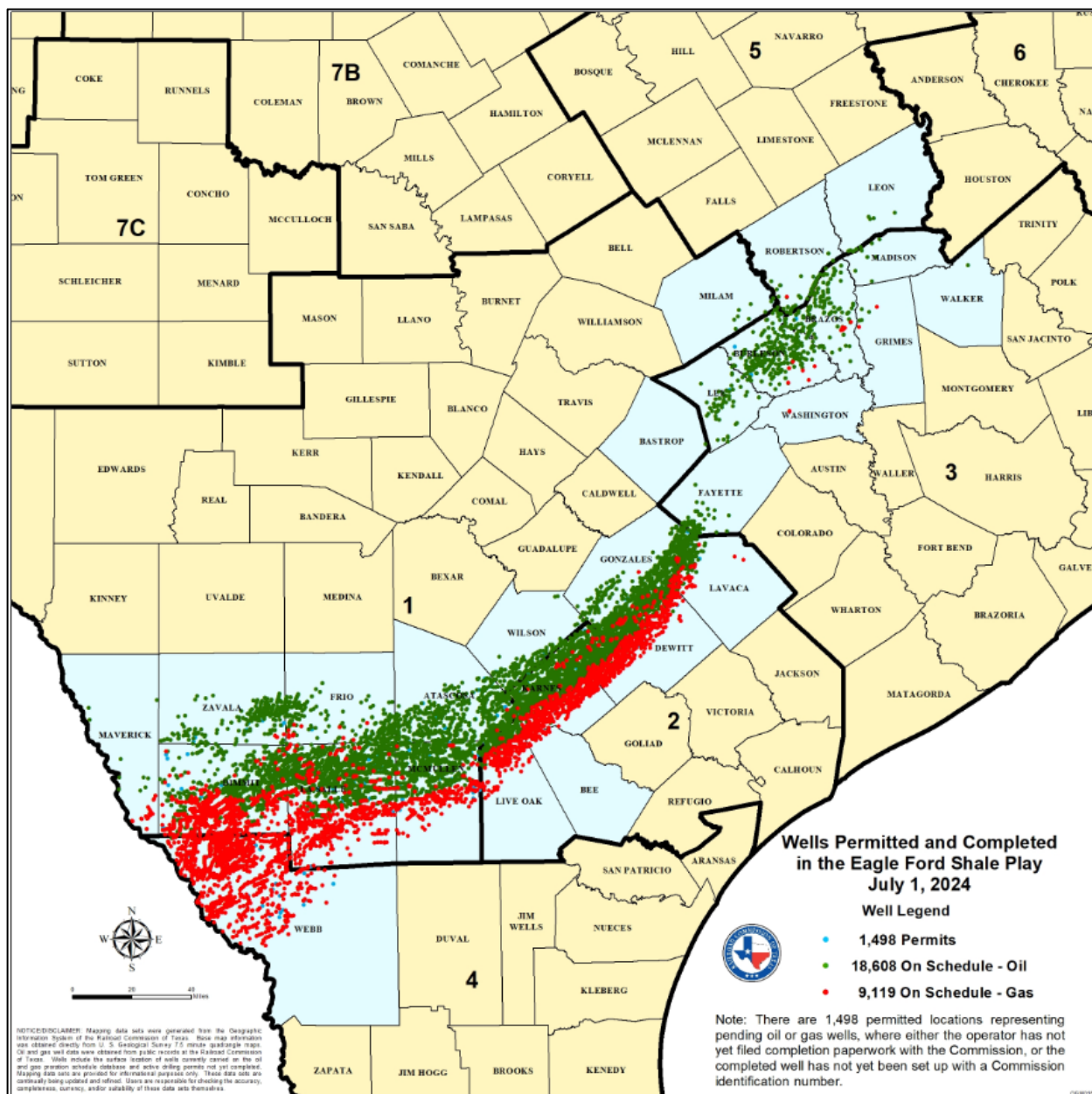


**Figure 18. Three 6-hour back-trajectories for air parcels over the Buddy Ganem station started at 10 meters, 100 meters, and 500 meters at 7 a.m. (13:00 UTC, a time scale used by many meteorologists, also known as Greenwich Mean Time)**

This high value of ethane triggered a look at the behavior of this compound in San Patricio County. Ethane is not an air toxic species and is one of the least chemically reactive species among the hydrocarbons measured by the auto-GCs used in San Patricio County. Thus, it is possible for natural gas leaks in, say, the Eagle Ford Shale Region between Corpus Christi and San Antonio to be measured in San Patricio County. There are pad sites for oil or natural gas extraction to the west and north of the Portland and Gregory communities and the Buddy Ganem air monitoring station. Figure 19 shows a number of pad sites for oil and gas activity in San Patricio County, while Figure 20 shows a map from the Texas Railroad Commission that shows the larger extent of oil and gas wells running southwest to northeast through South Texas largely north of San Patricio County.



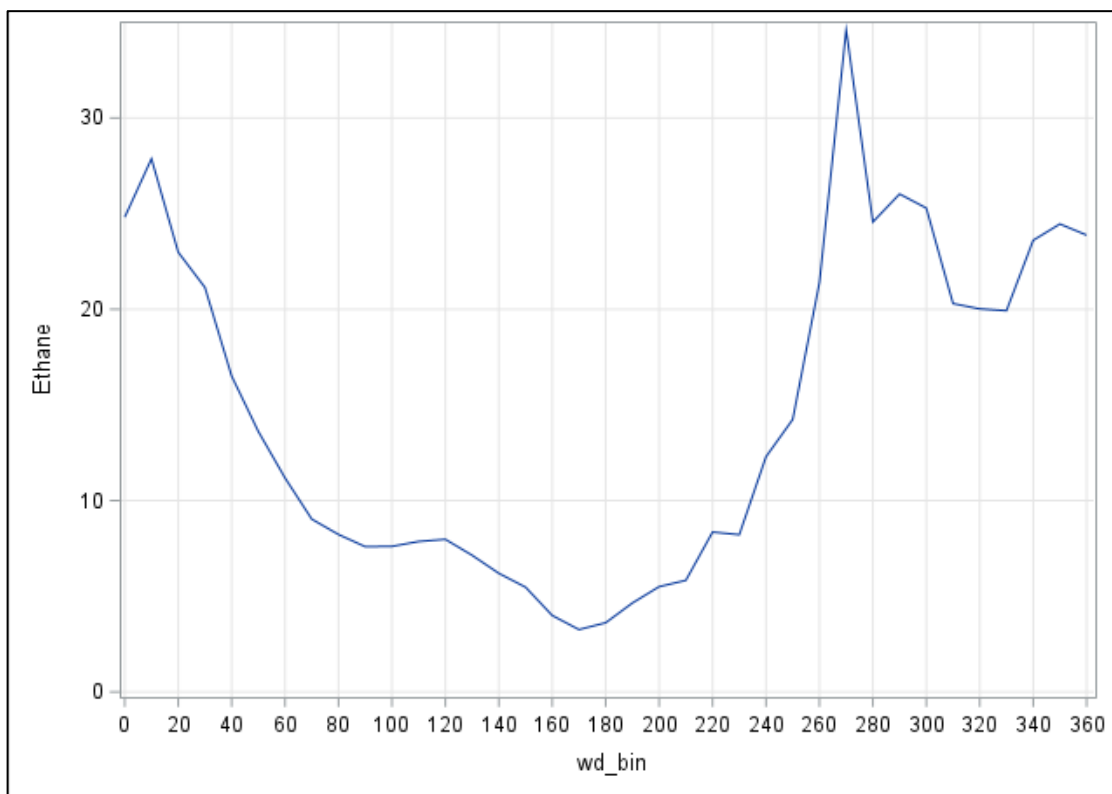
**Figure 19. Aerial view of the San Patricio County air monitors and industrial facilities, with many small white rectangles in the surrounding area north and west of the monitors, many of which are oil or natural gas extraction pad site. Some pad sites are for non-polluting wind turbines generating electricity.**



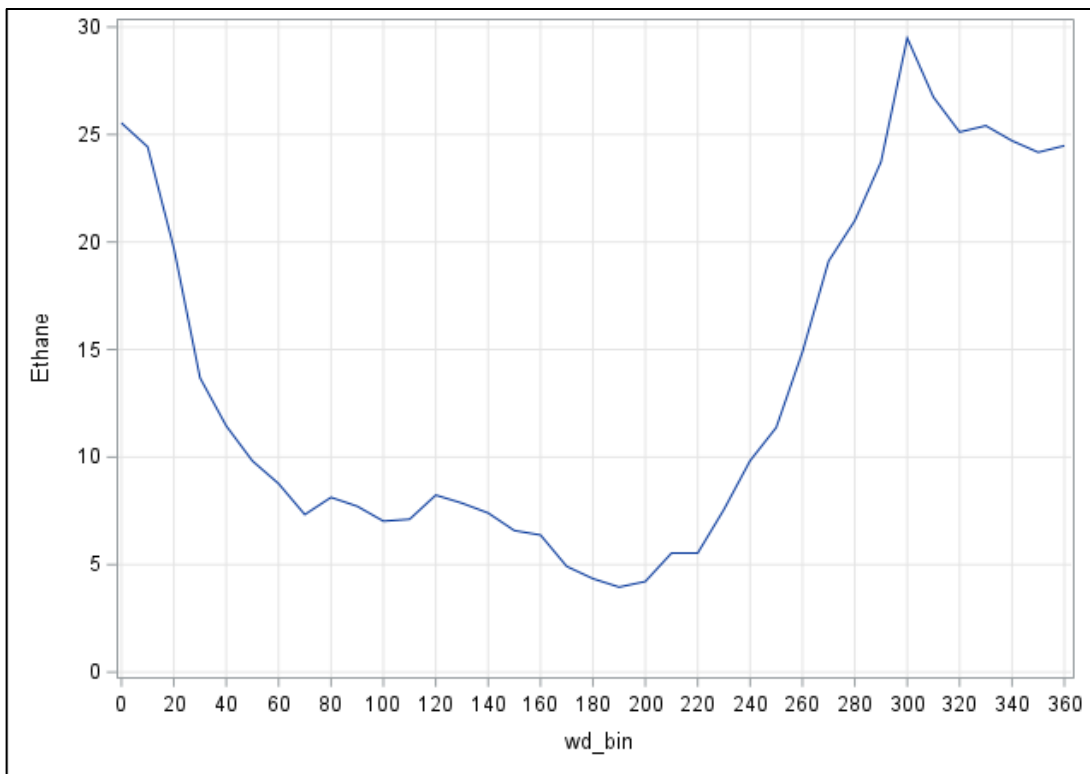
**Figure 20. Map provided by the Texas Railroad Commission, the agency that regulates the oil and natural gas industry in Texas (from <https://www.rrc.texas.gov/media/f4sbu4aq/ogm0168.jpg> accessed January 2025)**

The ethane data from the three stations were combined with the coincident wind speed and direction measurements to estimate the mean concentration of ethane, adjusted for wind speed, by upwind direction in 10-degree bins. In “adjusting for wind speed”, we use the basis for diffusion modeling, that under higher speed wind gases disperse, but under stagnant winds, concentrations can be higher. So, by multiplying wind speed by the pollutant concentration, while dividing by the average wind speed, one gets closer to estimating the strength of an upwind source. Figure 21 to Figure 23

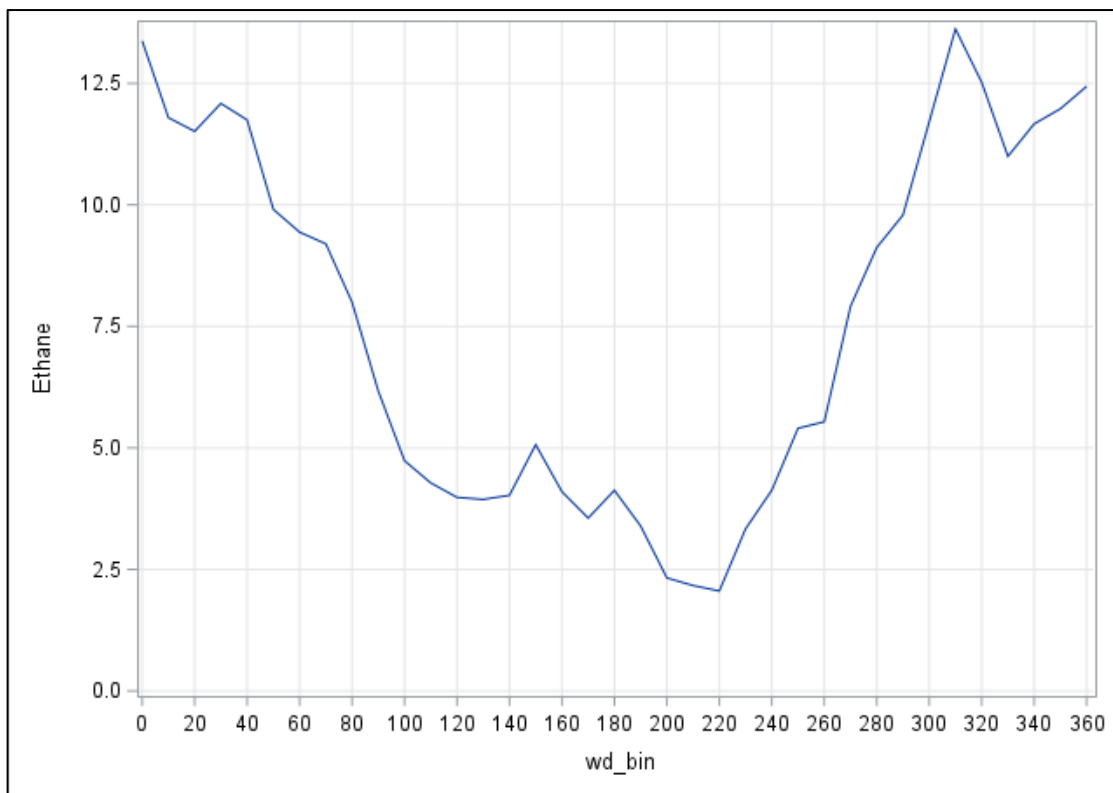
Buddy Ganem, 2020 – 2024 by 10-degree wind direction bin (0 & 360 = north, 90 = east, 180 = south, 270 = west). show the results of graphing the wind-adjusted mean ethane by wind direction at each station. All three stations show the highest concentrations coming from the west through the northeast, with the lowest concentrations from the south. These data were also examined by year and without adjusting for wind speed, and results were largely the same. This highly suggests transport from outside the Portland/Gregory community from oil & gas extraction fields.



**Figure 21. Mean wind-speed adjusted ethane (ppbC) at Buddy Ganem, 2020 – 2024 by 10-degree wind direction bin (0 & 360 = north, 90 = east, 180 = south, 270 = west).**



**Figure 22. Mean wind-speed adjusted ethane (ppbC) at Broadway, 2020 – 2024 by 10-degree wind direction bin.**



**Figure 23. Mean wind-speed adjusted ethane (ppbC) at Gregory Fresnos, 2020 – 2024 by 10-degree wind direction bin.**



## **6.0 Conclusions**

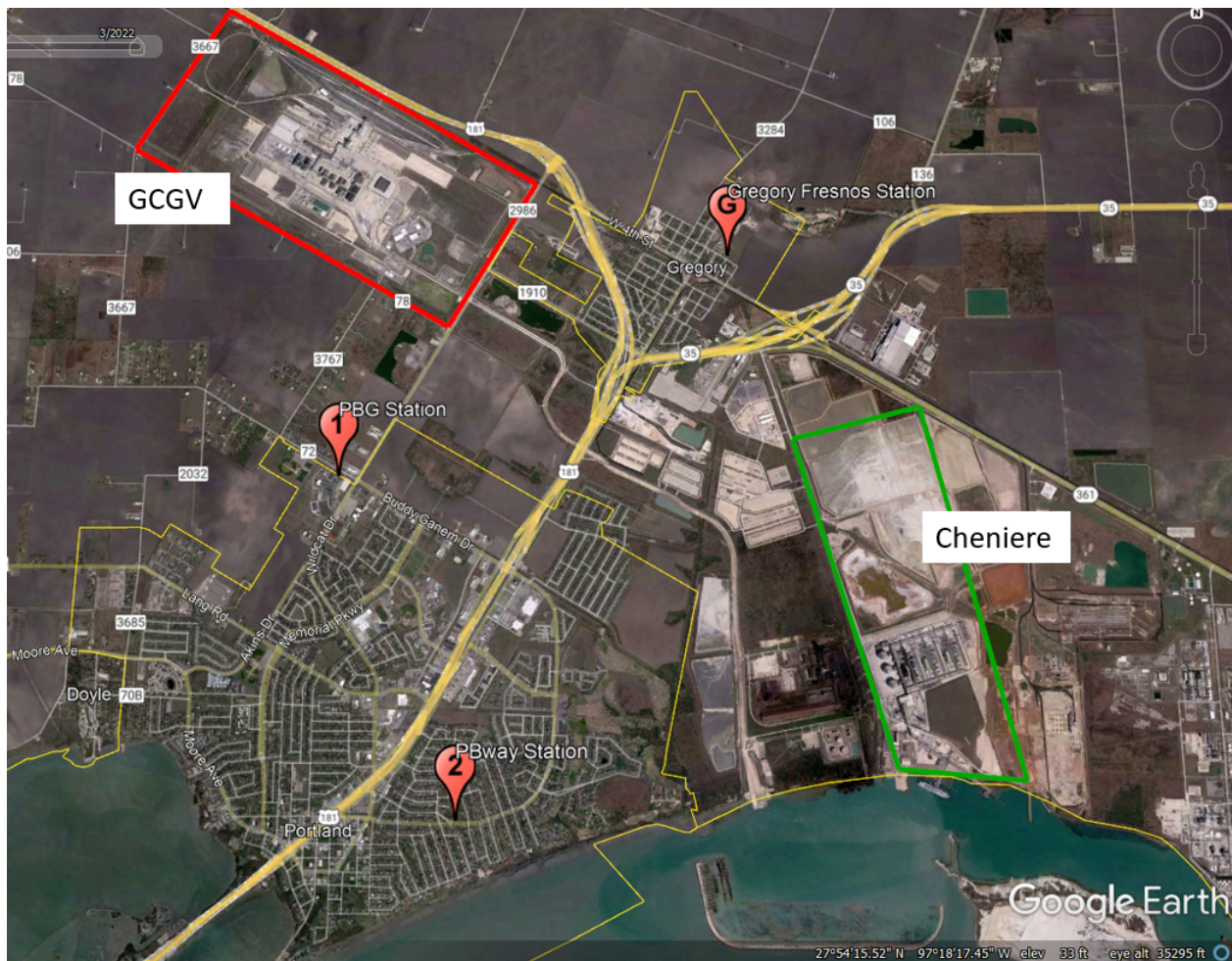
The air monitoring to date has been very successful. Although some concentrations have occasionally exceeded the concentration levels of the NAAQS, to date, the NAAQS have not been violated. Furthermore, measured hydrocarbon concentrations have not exceeded TCEQ long- term or short-term AMCVs. To date, operations at the GCGV facility and the Cheniere Energy facility do not appear to have affected the level of pollutants measured at project stations. UT Austin would be happy to answer any questions or conduct additional analysis at the community's or sponsors' requests.

## **Appendices**

## A.1 Air Monitoring Station Locations & Information

Table A-1. Gregory-Portland Community Air Monitoring Stations and Parameters Measured

Air Monitoring Station Name & Address	Volatile Organic Compounds (VOCs) 46 compounds	Ethylene oxide (EtO) 24 hr canister every sixth day	Nitrogen Oxides (NO <sub>x</sub> , NO, & NO <sub>2</sub> )	Sulfur Dioxide (SO <sub>2</sub> )	Particulate Matter (PM) Mass, particles < 2.5 micron diameter	Wind Speed (WS), Wind Direction (WD), Ambient Temperature (T), Relative Humidity (RH), & Barometric Pressure (BP)
Gregory Fresnos Stephen Austin Elementary 401 Fresnos St. Gregory, TX	Yes	No	Yes	Yes	Yes	Yes
Portland Buddy Ganem 307 Buddy Ganem St. GP High School Portland, TX	Yes	Yes	No	No	Yes	Yes. + precipitation
Portland Broadway 175 Broadway Blvd. Old East Cliff Elementary School Portland, TX	Yes	Yes	No	No	Yes	Only WS, WD



**Figure 24. Location of Gregory-Fresno Community Air Monitoring Station (GF, pin G), and two Portland community stations on GPISD campuses on Buddy Ganem (PBG, pin 1) and on Broadway (PBway, pin 2) and the Cheniere Energy and GCGV industrial facilities**

## A.2 Glossary of Terms and Terminology

**Pollutant concentrations** – Concentrations of most gaseous pollutants are expressed in units denoting their “mixing ratio” in air, i.e., the ratio of the number molecules of the pollutant to the total number of molecules per unit volume of air. Because concentrations for all gases other than molecular oxygen, nitrogen, and argon are very low, the mixing ratios are usually scaled to express a concentration in terms of “parts per million” (ppm) or “parts per billion” (ppb).

Sometimes the units are explicitly expressed as ppm-volume (ppmV) or ppb-volume (ppbV) where 1 ppmV indicates that one molecule in one million molecules of ambient air is the compound of interest and 1 ppbV indicates that one molecule in one billion molecules of ambient air is the compound of interest. In general, air pollution standards and health effects screening levels are expressed in ppmV or ppbV units. Because hydrocarbon species may have a chemical reactivity related to the number of carbon atoms in the molecule, mixing ratios for these species are often expressed in ppb-carbon (ppbV times the number of carbon atoms in the molecule), to reflect the ratio of carbon atoms in that species to the total number of molecules in the volume. This is relevant to our measurement of auto-GC species and TNMHC, which are reported in ppbC units. For the purpose of relating hydrocarbons to health effects, this report notes hydrocarbon concentrations in converted ppbV units. However, because TNMHC is a composite of all species with different numbers of carbons, it cannot be converted to ppbV. Pollutant concentration measurements are time-stamped based on the start time of the sample, in Central Standard Time (CST), with sample duration noted.

**Auto-GC** – The automated gas chromatograph collects a sample for 40 minutes, and then automatically analyzes the sample for a target list of 46 hydrocarbon species. These include benzene and 1,3-butadiene, which are air toxics, various species that have relatively low odor thresholds, and a range of gasoline and vehicle exhaust components.

**Total non-methane hydrocarbons (TNMHC)** – TNMHC represent a large fraction of the total volatile organic compounds released into the air by human and natural processes. TNMHC is an unspiciated total of all hydrocarbons, and individual species must be resolved by other means, such as with canisters or auto-GCs.

**Canister** – Electro-polished stainless-steel canisters are filled with 24-hour air samples on a regular every sixth-day schedule, or when an independent sensor detects that *elevated* (see below) levels of hydrocarbons (TNMHC or a specific chemical species) are present. Event-triggered samples are taken for a set time period to capture the chemical make-up of the air.

**Air Monitoring Comparison Values (AMCV)** – The TCEQ uses AMCVs in assessing ambient data. Two valuable online documents (“Fact Sheet” and “Uses of ESLs and AMCVs Document”) that explain AMCVs are at <https://www.tceq.texas.gov/toxicology/amcv/about> (accessed January 2025). The following text is an excerpt from the TCEQ “Fact Sheet” document:

Effects Screening Levels are chemical-specific air concentrations set to protect human health and welfare. Short-term ESLs are based on data concerning acute health effects, the potential for odors to be a nuisance, and effects on vegetation, while long-term ESLs are based on data concerning chronic health and vegetation effects. Health-based ESLs are set below levels where health effects would occur whereas welfare-based ESLs (odor and

vegetation) are set based on effect threshold concentrations. The ESLs are screening levels, **not ambient air standards**. Originally, the same long- and short-term ESLs were used for both air permitting and air monitoring.

There are significant differences between performing health effect reviews of air permits using ESLs, and the various forms of ambient air monitoring data. The Toxicology Division is using the term “air monitoring comparison values” (AMCVs) in evaluations of air monitoring data in order to make more meaningful comparisons. “AMCVs” is a collective term and refers to all odor-, vegetative-, and health-based values used in reviewing air monitoring data. Similar to ESLs, AMCVs are chemical-specific air concentrations set to protect human health and welfare. Different terminology is appropriate because air *permitting* and air *monitoring* programs are different.

**Rationale for Differences between ESLs and AMCVs** – A very specific difference between the permitting program and monitoring program is that permits are applied to one company or facility at a time, whereas monitors may collect data on emissions from several companies or facilities or other source types (e.g., motor vehicles). Thus, the protective ESL for permitting is set lower than the AMCV in anticipation that more than one permitted emission source may contribute to monitored concentrations.

**National Ambient Air Quality Standards (NAAQS)** – U.S. Environmental Protection Agency (EPA) has established a set of standards for several air pollutants described in the Federal Clean Air Act. NAAQS are defined in terms of *levels* of concentrations and particular *forms*. For example, the NAAQS for particulate matter with size at or less than 2.5 microns (PM<sub>2.5</sub>) has a *level* of 9 micrograms per cubic meter averaged over 24- hours, and a *form* of the annual average based on four quarterly averages, averaged over three years. Individual concentrations measured above the level of the NAAQS are called *exceedances*. The number calculated from a monitoring site’s data to compare to the level of the standard is called the site’s *design value*, and the highest design value in the area for a year is the regional design value used to assess overall NAAQS compliance. A monitor or a region that does not comply with a NAAQS is said to be *noncompliant*. At some point after a monitor or region has been in noncompliance, the U.S. EPA may choose to label the region as *nonattainment*. A nonattainment designation triggers requirements under the Federal Clean Air Act for the development of a plan to bring the region back into compliance. A more detailed description of NAAQS can be found on the EPA’s Website at <https://www.epa.gov/criteria-air-pollutants#self> (accessed January 2025)

One species measured by this project and regulated by a NAAQS is sulfur dioxide (SO<sub>2</sub>). EPA set the SO<sub>2</sub> NAAQS to include a level of 75 ppb averaged over one hour, with a form of the three-year average of the annual 99<sup>th</sup> percentiles of the daily maximum one- hour averages. If measurements are taken for a full year at a monitor, then the 99<sup>th</sup> percentile would be the fourth highest daily one hour maximum. There is also a secondary SO<sub>2</sub> standard of 500 ppb over three hours, not to be exceeded more than once in any one year.

**Elevated Concentrations** – In the event that measured pollutant concentrations are above a set threshold they are referred to as “elevated concentrations.” The values for these thresholds are summarized by pollutant below. As a precursor to reviewing the data, the reader should understand the term “*statistical significance*.” In the event that a concentration is higher than one

would typically measure over, say, the course of a week, then one might conclude that a specific transient assignable cause may have been a single upwind pollution source, because experience shows the probability of such a measurement occurring under normal operating conditions is small. Such an event may be labeled “statistically significant” at level 0.01, meaning the observed event is rare enough that it is not expected to happen more often than once in 100 trials. This does not necessarily imply the failure to meet a health-based standard. A discussion of “elevated concentrations” and “statistical significance” by pollutant type follows:

- For SO<sub>2</sub>, any measured concentration greater than the level of the NAAQS, which is 75 ppb over one hour, is considered “elevated.” Note that the concentrations of SO<sub>2</sub> need not persist long enough to constitute an exceedance of the standard to be regarded as elevated. In addition, any closely spaced values that are statistically significantly (at 0.01 level) greater than the long-run average concentration for a period of one hour or more will be considered “elevated” because of their unusual appearance, as opposed to possible health consequence. The rationale for doing so is that unusually high concentrations at a monitor may suggest the existence of unmonitored concentrations closer to the source area that are potentially above the state’s standards.
- For TNMHC, any measured concentration greater than the threshold of 2000 ppbC is considered “elevated.”
- For benzene and other air toxics in canister samples or auto-GC measurements, any concentration above the AMCV is considered “elevated.” Note that 40-minute auto-GC measurements are compared with the short-term AMCV.
- Some hydrocarbon species measured by the auto-GC generally appear in the air in very low concentrations close to the method detection level. Similar to the case above with SO<sub>2</sub>, any values that are statistically significant (at 0.01 level) greater than the long-run average concentration at a given time or annual quarter will be considered “elevated” because of their unusual appearance, as opposed to possible health consequence. The rationale for doing so is that unusually high concentrations at a monitor may suggest an unusual emission event in the area upwind of the monitoring site.