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June 30, 2025

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Morgan Bishop, Mobile Baykeeper mbishop@mobilebaykeeper.org

Thank you for your comments on the Alabama Air Monitoring 2025 Network Plan.

The response to these comments is attached and will be included along with your comments in the Network Plan submitted to EPA for approval.

Sincerely,

A handwritten signature in blue ink, appearing to read "A. H. White III".

Aubrey H. White III, Chief

Air Division

ADEM

AHW/lwb

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SELC, GASP, MBK, and MEJAC submitted comments on the Ambient Air Monitoring 2025 Network Plan. ADEM's replies to these comments are listed below.

1. In order to represent ambient air quality on the Africatown Community, ADEM should site the Africatown Monitor at the Africatown Hall Location.

When looking for a new location, ADEM must follow the criteria listed in §40CFR58 Appendix E. The Chickasaw monitor is the representative monitor for the Mobile MSA. The new location will also be the representative site for the Mobile MSA on a neighborhood scale. Neighborhood scale defines concentrations within some extended area of the city that has relatively uniform land use with dimensions in the 0.5 to 4.0 kilometer range. It is appropriate for measurements intending to represent highest concentrations, population-oriented impacts, and impacts from sources. This monitor's purpose is not intended to capture fence line emissions for source monitoring; it must be representative of the area. In the image below, the yellow circle illustrates the maximum scale of the new site, which encompasses: historical Africatown, industrial areas, and a significant portion of where people live. To ensure the area is meeting the National Ambient Air Quality Standards (NAAQS), the monitor needs to be placed where the people live, breathe, and spend their time. This monitor will record the Ozone, PM_{2.5} and SO₂ levels of air in the same location where people live and go to school and will characterize their air.

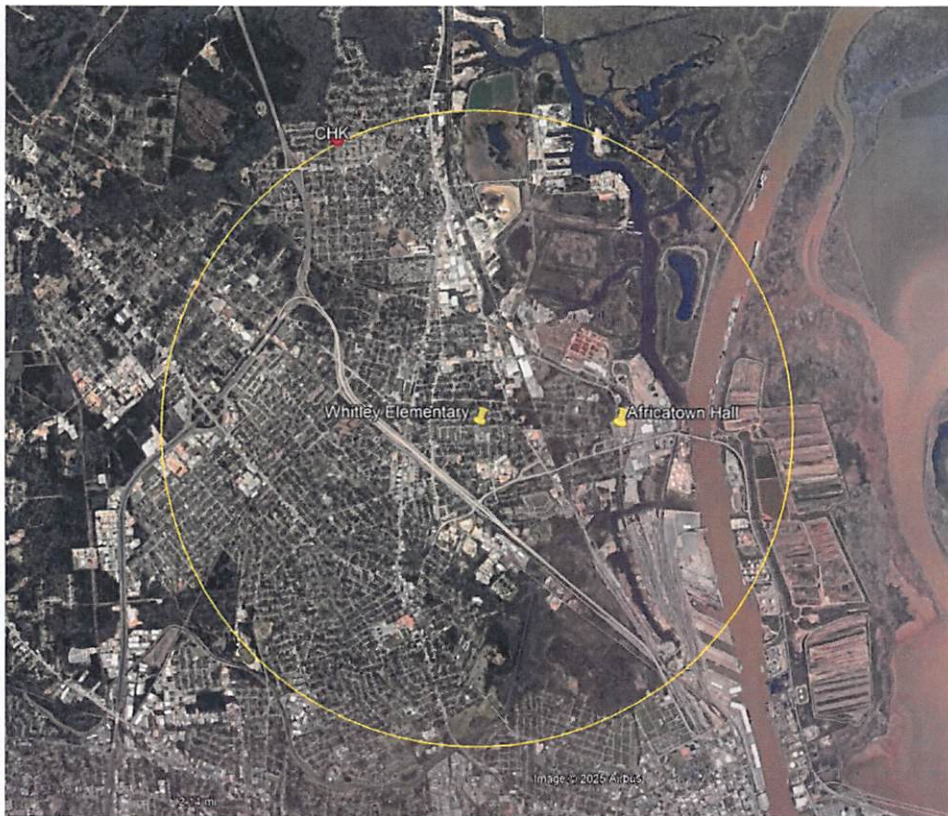


Figure 1: Yellow circle represents maximum neighborhood scale of the Whitley Elementary School Site.



Windrose Plot for [MOB] MOBILE/BATES FIELD
 Obs Between: 07 May 2020 12:56 AM - 07 May 2025 10:56 PM America/Chicago

5-Year to Date Wind Rose

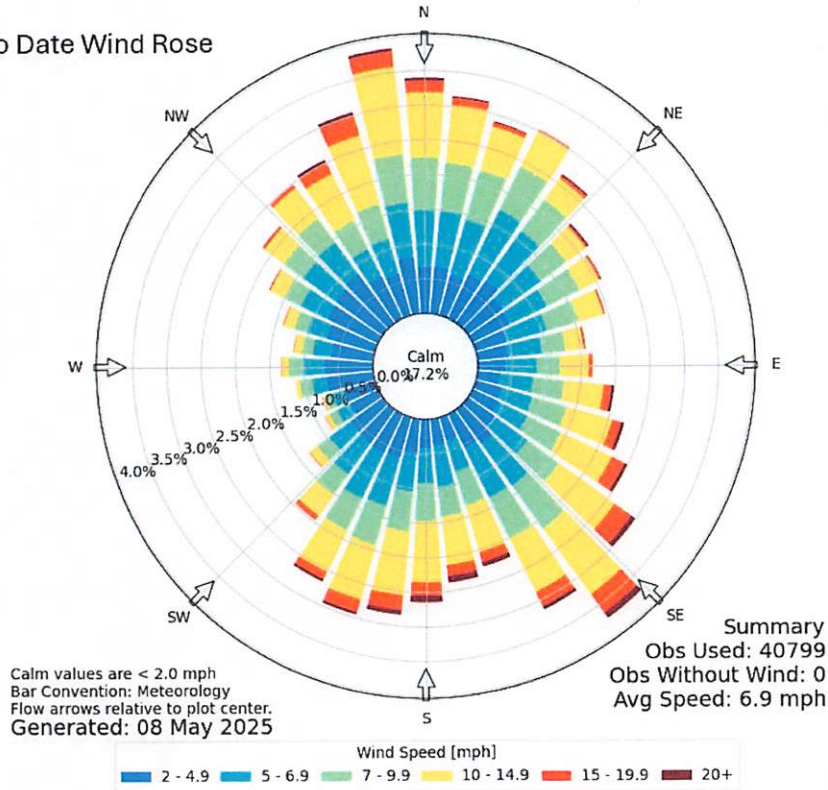


Figure 2 Windrose of the Chickasaw Area

Of the two options, the Whitley Elementary School site is the suitable site for ambient monitoring in the Mobile MSA. It is located closer to due South of the Chickasaw site, in-line to capture similar prevailing winds from both directions. It is located in a neighborhood closest to the most vulnerable population (i.e. young children). Having a monitor directly adjacent to where people live and go to school ensures it is accurately characterizing the ambient air of the community. As the commentors noted, heavy traffic does concern this neighborhood. ADEM reviewed the Annual Average Daily Traffic (AADT) counts for both sites. The Whitley Elementary site is less than 0.5 mile from four main throughfares (0.3 mi from Telegraph Rd [AADT: 6,309], 0.4 mi from I-65 [AADT: 39,490], 0.45 mi from US HWY 90 [AADT: 26,711] and 0.5 mi North Wilson Ave [AADT: 7,518]) but with enough distance to ensure concentrations are still considered ambient. The monitor's main purpose is to determine compliance of the ambient air with the NAAQS and the Department has determined that the Whitley Elementary site is most representative of ambient air quality for the Mobile MSA of the potential sites considered.

With regard to the comment in this section requesting additional pollutants be monitored at this site and an accounting of any request for grant funding for additional monitoring from EPA during this period, as we have responded in previous years to similar comments, monitoring programs are very expensive to operate and maintain. As part of the previous IRA grant opportunities, ADEM did request and was granted approximately \$590,000 additional funds

which were spent on replacing older unreliable monitors, replacing dilapidated shelters for the monitors, and replacing calibration equipment. Over \$100,000 of these funds are to be used for updating the equipment and relocating the Chickasaw monitoring station to Africatown. These were requirements to keep the existing monitoring stations operating now and into the future. Funding for additional monitoring was not included.

2. ADEM should analyze, adequately monitor, and address the root causes of the continued statewide increase in ozone concentrations.

As we explained in the response to this comment in the 2024 Network Plan, we still believe that the increase (while very slight from 2021-2023 to 2022-2024) is due to the reduction in ozone levels seen during the covid period (2020-2022). When looking at the emissions yearly, ozone levels appear to be returning to levels similar to those prior to 2020. In general, ozone precursor emissions of NO_x have risen following the reductions during covid, but are reducing again and are expected to continue to decline due to the replacement of coal with natural gas in electricity generation and with the continued reduction of older vehicles on the roadways. Additionally, ozone is extremely sensitive to atmospheric conditions, including temperature, humidity, and mixing. Therefore, comparison of ozone levels from different periods must consider multiple factors.