

2024 Delaware Ambient Air Monitoring Network Plan for Criteria Pollutants



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List of Acronyms

AQS – Air Quality System
BC – Black Carbon
CAA – Clean Air Act
CBSA – Core Based Statistical Area
CFR – Code of Federal Regulations
CO – carbon monoxide
CSA – combined statistical area
DNREC – Department of Natural Resources and Environmental Control
EPA – Environmental Protection Agency
FEM – Federal Equivalent Method
FRM – Federal Reference Method
ICP/MS - Inductively Coupled Plasma/Mass Spectrometry
LPM – liters per minute
MSA – metropolitan statistical area
NAAQS – National Ambient Air Quality Standards
NO – nitric oxide
NO₂ – nitrogen dioxide
NO_x – total NO and NO₂ oxides of nitrogen
NO_y – total reactive oxides of nitrogen
O₃ – ozone
OTR – Ozone Transport Region
PAMS – Photochemical Assessment Monitoring System
Pb - lead
PM_{2.5} – fine particulate matter (2.5 microns)
PM₁₀ – respirable particulate matter (10 microns)
PM_{10-2.5} – coarse particulate matter (PM₁₀ – PM_{2.5})
SLAMS – state and local monitoring stations
SO₂ – sulfur dioxide
SPM – Special Purpose Monitor
Temp/RH – temperature and relative humidity
UFP – ultrafine particles
VOC – volatile organic carbon
WS/WD – wind speed/wind direction

Introduction

In 1970, Congress passed the Clean Air Act that authorized the Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) for pollutants shown to threaten human health and welfare. Primary standards were set according to criteria designed to protect public health, including an adequate margin of safety to protect sensitive populations such as children and asthmatics. Secondary standards were set according to criteria designed to protect public welfare (decreased visibility, damage to crops, vegetation, and buildings, etc.).

Seven pollutants currently have NAAQS: ozone (O₃), carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), particulate matter less than 10 microns (PM₁₀), particulate matter less than 2.5 microns (PM_{2.5}) and lead (Pb). These are commonly called the "criteria" pollutants. When air quality does not meet the NAAQS, the area is said to be in "nonattainment" with the NAAQS.

Requirements for Annual Monitoring Network Plan

In October 2006, the EPA issued final regulations concerning state and local agency ambient air monitoring networks (see 71 FR 61298). These regulations are codified at 40 CFR Part 58 and require periodic assessments of the monitoring networks including the information described below.

§58.10 Annual monitoring network plan and periodic network assessment, Section §58.10 (a) requires for each existing and proposed monitoring site:

- 1) A statement that the operation of each monitor meets the requirements of appendices A, C, D, and E of 40 CFR Part 58, where applicable.
- 2) Proposals for any State and Local Air Monitoring station (SLAMS) network modifications.

Section §58.10 (b) The annual monitoring network plan must contain the following information for each existing and proposed site:

- 1) The Air Quality System (AQS) site identification number.
- 2) The location, including street address and geographical coordinates.
- 3) The sampling and analysis method(s) for each measured parameter.
- 4) The operating schedules for each monitor.
- 5) Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal.
- 6) The monitoring objective and spatial scale of representativeness for each monitor as defined in Appendix D to 40 CFR Part 58.
- 7) The identification of any sites that are suitable and sites that are not suitable for comparison against the annual PM_{2.5} NAAQS as described in §58.30.
- 8) The Metropolitan Statistical Area (MSA), Core Based Statistical Area (CBSA), Combined Statistical Area (CSA) or other area represented by the monitor.
- 9) The identification of required NO₂ monitors as either near-road or area-wide sites in accordance with Appendix D to 40 CFR Part 58.

All proposed changes to SLAMS monitors in the annual monitoring network plans and periodic network assessments are subject to EPA Regional approval according to 40 CFR Part 58.14.

Delaware Ambient Air Monitoring 5-year Network Assessment 2020

Executive Summary from Assessment

40 CFR Part 58.10(d) requires Delaware to perform and submit to the EPA Regional Administrator an ambient air monitoring network assessment (Assessment) of the air quality surveillance system every 5 years to determine, at a minimum, if the network meets the monitoring objectives defined in Appendix D of this part, whether new sites are needed, whether existing sites are no longer needed and can be terminated, and where new technologies are appropriate for incorporation in the ambient air monitoring network.

Delaware's 2020 network assessment was completed and submitted to EPA for review and approval in 2021. The next assessment is scheduled to be performed in 2025. The following is a summary of Delaware's current 5-Year Monitoring Network Assessment, the Division of Air Quality (DAQ) performed which included a technical review of the data collected in the ambient monitoring network. To conduct this review, DAQ performed the following:

- a. Population data was summarized for all three counties in Delaware. This information was used to determine the appropriateness of monitoring for population exposure.
- b. Meteorological parameters were reviewed to establish upwind / downwind relationships between a monitor site and surrounding emission sources.
- c. Emission inventory summary data was reviewed. This information was used to determine if a monitor is sited appropriately to represent maximum pollution concentrations or specific ambient source impacts quantification.
- d. Historical data collected at each site was reviewed for trends and comparison to the current National Ambient Air Quality Standards. This is helpful to determine if Delaware is achieving air quality improvements and meeting air quality standards.
- e. Site by site correlation analysis was performed using tools supplied by EPA for appropriate monitors. This information is used to determine if information collected at sites is redundant and if the site may be considered for elimination.
- f. A bias calculation was performed to determine impacts that may occur if a monitor is removed from the network.

DAQ evaluated the data from this technical review according to defined performance measures. We also expanded performance measures beyond application of this technical information.

Performance measures were organized into the following categories:

- a. Data Criteria
- b. Statistical Criteria
- c. Situational Criteria
- d. Future Needs and Special Considerations

Specific performance measures used in this Assessment are detailed in the Delaware Air Monitoring Network – Current Network Description section. Not all performance measures were applicable to every monitor / site. Based upon the evaluation of these performance measures, DAQ determined the importance (critical, credible, marginal, new site required) of each monitor in the network:

- **Critical sites** are of high value and will be continued.

- **Credible sites** are expected to continue but may not be the design value location at or above the NAAQS.
- **Marginal sites or monitors** are subject for removal or movement.
- **New site required** represent potential areas of investment.

Network Assessment Results

The results of the 2020 Assessment indicated that the network contains only critical or credible sites. Issues that may impact future network design include new monitoring requirements associated with new or revised NAAQS, aging equipment/maintenance issues, and resource availability. When any future monitoring rules are promulgated, Delaware will work closely with EPA Region 3 to ensure that all new monitoring requirements are met.

The annual network plan for 2024 incorporates the results of the 2020 Assessment. Since all monitors are rated critical or credible, no major changes are recommended for 2024. Delaware continues to leverage federal funding as it becomes available to replace aging monitoring instruments and site shelters. Additional information regarding the planned replacements is found under Summary of Changes.

Delaware Air Monitoring Network

History of air monitoring in Delaware

Air pollution monitoring in Delaware began in the 1950s, prior to the establishment of the US EPA. The first monitors were simple mechanisms or passive collectors such as dust-fall buckets and tape samplers. These were followed in the 1960s by wet-chemistry instruments, which were soon replaced by more advanced electronic instruments. The addition of computer technology in operating monitoring systems and air pollution data collection in the late 1970s and early 1980s was critical to the development of the core-monitoring network that exists today.

The earliest monitors were placed near pollution sources to measure direct impact of pollution emissions. As ambient air pollution standards became established and monitoring methods standardized, the monitoring network expanded to include monitors in both urban and suburban areas. Monitoring goals shifted to include measuring high pollution concentrations in population centers, detecting trends, and determining compliance with the new national and ambient air quality standards, as well as establishing background levels and measuring pollution transported from areas outside of Delaware.

With the passage of the Clean Air Act in 1970, and the Clean Air Act Amendments in 1990, various control measures implemented by the federal and state governments resulted in major improvements in air quality, particularly regarding major industrial sources. Pollutants of concern today come from a variety of sources including mobile (both on-road and off-road vehicles) sources, large industrial facilities, and smaller industries and business. Delaware continues to use its ambient monitoring network to track changes in air quality across the state and evaluate compliance with ambient air quality standards.

Network Overview

The State of Delaware has established an air monitoring network to determine the ambient levels of the pollutants for which NAAQS have been established. The Delaware Air Monitoring Network consists of the sites and monitors throughout the state, which are listed and described in this document. This network is maintained and operated by the Ambient Monitoring Program of the Division of Air Quality, DNREC.

National Core Monitoring Strategy – NCore

In October 2006 the United States Environmental Protection Agency (EPA) issued final amendments to the ambient air monitoring regulations for criteria pollutants. These amendments are codified in 40 CFR parts 53 and 58. The purpose of the amendments was to enhance ambient air quality monitoring to better serve current and future air quality needs. One of the most significant changes in the regulations was the requirement to establish National Core (NCore) multi-pollutant monitoring stations. These stations provide data on several pollutants at lower detection limits and replace the National Air Monitoring Station (NAMS) networks that have existed for several years. The final network plan was submitted to EPA on July 1, 2009 and the station was fully operational on January 1, 2011.

The NCore Network addresses the following monitoring objectives:

- timely reporting of data to the public through AirNow, air quality forecasting, and other public reporting mechanisms
- support development of emission strategies through air quality model evaluation and other observational methods
- accountability of emission strategy progress through tracking long-term trends of criteria and non-criteria pollutants and their precursors
- support long-term health assessments that contribute to ongoing reviews of the National Ambient Air Quality Standards (NAAQS)
- compliance through establishing nonattainment/attainment areas by comparison with the NAAQS
- support multiple disciplines of scientific research, including; public health, atmospheric and ecological

The NCore sites must measure, at a minimum, $PM_{2.5}$ particle mass using continuous and integrated/filter-based samplers, speciated $PM_{2.5}$, $PM_{10-2.5}$ particle mass, O_3 , SO_2 , CO , NO/NO_y , lead, wind speed, wind direction, relative humidity, and ambient temperature.

Each State is required to operate at least one NCore site. The objective is to locate sites in broadly representative urban (about 50 sites) and rural or regional (about 20 sites) locations throughout the country to help characterize urban- and regional-scale patterns of air pollution. Monitoring agencies are encouraged by EPA to collocate NCore sites with existing sites already measuring ozone precursors, air toxics, or $PM_{2.5}$ speciation components. By combining these monitoring programs at a single location, stakeholders can maximize the multi-pollutant information available. This approach not only leverages existing resources but also notably enhances the foundation for future health studies and NAAQS revisions.

In 2009, EPA provided funding to begin the process of establishing an NCore station in Delaware. After evaluating the existing network, historical data, census data, meteorology, and topography, Delaware's proposal for the existing MLK monitoring site as Delaware's NCore site was accepted by EPA.

Delaware's NCore monitoring, including PM_{coarse} , ozone, and NO_y , became operational on January 1, 2011.

Monitoring Site Network Map and Information

Following is the Delaware ambient air monitoring site network map as of January 2024.

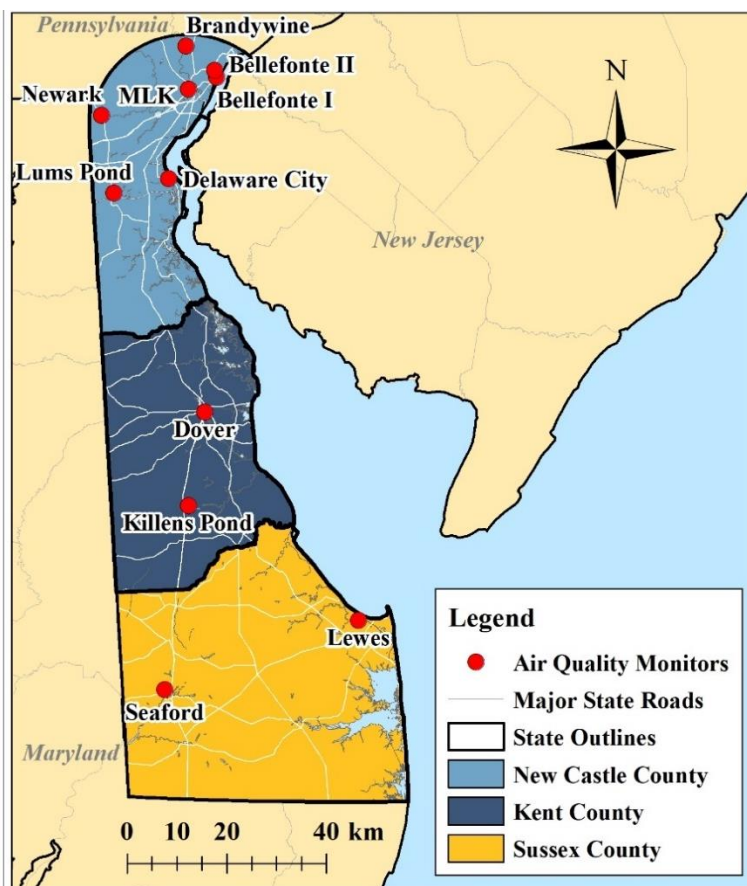


Figure 1 - Ambient monitoring sites in Delaware

On the following page is a table with summary information on every SLAMS site in Delaware. Information includes site name and AQS ID, active parameters as of January 2024, the date when each monitor began collecting information, the scale of representativeness for each parameter, the monitoring objective, and any other comments relating to the site or monitor. Street address geographic coordinates are included for each site in Appendix A.

All monitoring sites that are part of a CBSA/MSA meet the minimum monitoring requirements specified in 40 CFR Part 58 Appendix D.

There are no major monitoring site changes from the 2023 Monitoring Plan. Table 1 presents a summary of sites and measured parameters in Delaware’s monitoring network.

Table 1. Monitoring Network Sites and Monitor Information

Site Name & AQS ID	Parameter	Monitoring Start Date	Objective	Comments
Killens Pond 10-001-0002	O ₃	4/1/1995	General/ Background	Rural site
	PM _{2.5} FEM continuous	1/1/1999	General/ Background	
	WS/WD	4/1/1995		
Dover 10-001-0003	PM _{2.5} FEM Continuous	1/1/2022	Population Exposure	Primary for PM _{2.5}
Brandywine 10-003-1010	O ₃	7/1/1994	Population Exposure	Secondary downwind of Wilmington
	WS/WD	11/1/2013		
Bellefonte II 10-003-1013	O ₃	4/1/2001	Population Exposure	Primary downwind of Wilmington
	SO ₂	3/1/2003	Population Exposure	
	PM _{2.5} FEM Continuous	2/1/2023	Population Exposure / Colocation Bellefonte I	
Bellefonte I 10-003-1003	PM _{2.5} FEM Continuous	1/1/2023	Population Exposure	Primary for PM _{2.5}
MLK 10-003-2004	SO ₂	1/1/1999	Population Exposure	Urban NCore Site PAMS information is detailed in section Appendix A
	CO	1/1/1999	Population Exposure	
	NO ₂	1/1/2001	Population Exposure/ Maximum Concentration	
	NO _y	1/1/2011	Population Exposure	
	O ₃	1/1/2011	Population Exposure/ NCore	
	PM _{2.5} FRM & FEM continuous	1/1/1999	Population Exposure/ Maximum Concentration	
	PM _{2.5} speciation	6/1/2001	Population Exposure/ NCore	
	PM ₁₀ (LC) and PM _{coarse}	1/1/2011	Population Exposure/ NCore	
BC	1/1/2001			
VOCs	1/1/1999			

Site Name & AQS ID	Parameter	Monitoring Start Date	Objective	Comments
	Metals	1/1/2003		
	WS/WD	6/1/2000		
	Temp/RH	1/1/2011		
Newark 10-003-1012	PM _{2.5} FEM Continuous	1/1/2023	Population Exposure	Manual PM _{2.5} FRM Shutdown end of 2022. Replaced by continuous FEM.
	O ₃	1/1/1992	Upwind Background/ Population Exposure	
Lums Pond 10-003-1007	SO ₂	1/1/2000	General Background/ Population Exposure	Rural/suburban, upwind of Wilmington during ozone season
	PM _{2.5} FRM & FEM continuous Collocation Req.	1/1/1999	Regional Transport/ Population Exposure	
	WS/WD	6/1/2013		
Delaware City (Route 9) 10-003-1008	SO ₂	2/1/1992	Population Exposure/ Source Oriented	Point source dominated site
	PM _{2.5} FEM continuous	6/1/2013	Population Exposure/ Source Oriented	
	WS/WD	5/1/2011		
Seaford 10-005-1002	O ₃	3/1/1990	Population Exposure	
	PM _{2.5} FEM continuous	1/1/1999	Population Exposure	
	WS/WD	5/1/2011	Population Exposure	
Lewes 10-005-1003	O ₃	5/1/1997	Population Exposure	Coastal site
	SO ₂	1/1/2013	Population Exposure	
	NO _x	Planned	Enhanced monitoring	
	WS/WD	6/1/1997		
11 Total Sites – 12 Different Parameters				

N/A – not applicable

Criteria Pollutant Network Description by Parameter

Ozone (O₃)

Ozone is measured by ultraviolet absorption photometry. Air is drawn through a sample cell where ultraviolet light (254 nm wavelength) passes through it. Light not absorbed by the ozone is converted into an electrical signal proportional to the ozone concentration.

Monitoring Requirements

Within an O₃ network, at least one O₃ site for each MSA, or CSA if multiple MSAs are involved, must be designed to record the maximum concentration for that metropolitan area. More than one maximum concentration site may be necessary in some areas. Other types of monitoring sites are needed to determine maximum population exposure, background concentrations, and concentrations being transported into an area (boundary conditions). In Delaware, New Castle County is part of the larger Philadelphia CSA, Kent County is covered by the Dover MSA, and Sussex County is part of the Salisbury MSA.

Table 2. Number of Ozone SLAMS Sites Required (based on Table D–2, Appendix D to 40 CFR Part 58, Ozone minimum monitoring requirements)

CSA/MSA Name (2020 Census Population)	County in Delaware	Delaware 2020 Census ¹ Population	Delaware Monitors	Total Required Monitors	Monitors located in EJ Communities
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD (6,245,051)	New Castle	570,719	4	3	1
Dover, DE	Kent	181,851	1	1	-
Salisbury, MD-DE (381,868)	Sussex	237,378	2	1	1
Total in DE		989,948	7	5	2

The appropriate spatial scales for O₃ sites are neighborhood, urban, and regional². Since O₃

¹ 2020 Census Data retrieved from www.census.gov.

² 40 CFR 58 Appendix D defines these as **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 kilometers range. The neighborhood and urban scales listed below have the potential to overlap in applications that concern secondarily formed or homogeneously distributed air pollutants. **Urban scale**—Defines concentrations within an area of city-like dimensions, on the order of 4 to 50 kilometers. Within a city, the geographic placement of sources may result in there being no single site that can be said to represent air quality on an urban scale. **Regional scale**—Defines usually a rural area of reasonably homogeneous geography without large sources, and extends from tens to hundreds of kilometers.

requires appreciable formation time, the mixing of reactants and products occurs over large volumes of air, and this reduces the importance of monitoring for small-scale spatial variability.

The prospective maximum concentration monitor site should be selected in a direction from the city that is most likely to observe the highest O₃ concentrations, more specifically, downwind during periods of photochemical activity. Since O₃ levels decrease significantly in the colder parts of the year in many areas, O₃ is required to be monitored only during the “ozone season” as designated in the 40 CFR Part 58 Appendix D, which in Delaware the monitoring season is March 1 through October 31.

Delaware operates seven ozone monitoring sites, including sites for population exposure, background concentrations, upwind and downwind directions for the Wilmington area, and NCore monitoring. Monitoring objectives for each site are included in the detailed site description section of this document. The monitors began operating year-round in 2011 although the official EPA ozone monitoring season for Delaware runs from March through October.

Hourly data is sent to the AirNow website to generate the daily Air Quality Index and to be used in mapping ozone concentrations throughout the region.

More detailed information on the O₃ standard and monitoring requirements can be found on the EPA website at: <https://www.epa.gov/ground-level-ozone-pollution>.

Operation of all ozone monitors in Delaware meets the requirements of 40 CFR Part 58 appendices A, C, D, and E as applicable.

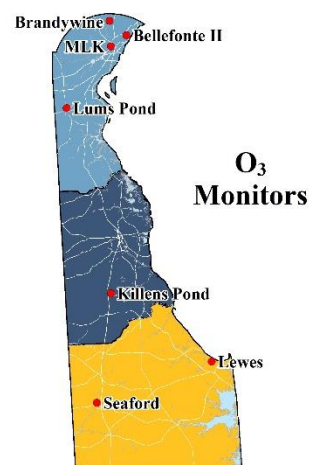


Figure 2 – DE Ozone monitoring sites

Particulate Matter - Fine (PM_{2.5})

The federal reference method (FRM) monitors for PM_{2.5} operate by drawing air through a specially designed inlet that excludes particles larger than 2.5 microns in diameter. The particles are collected on a Teflonmicrofiber filter that is weighed to determine the particulate mass.

Monitoring Requirements

State agencies must operate at least the minimum number of required PM_{2.5} sites listed in 40 CFR Part 58 Appendix D Table D-5. These required monitoring stations or sites must be sited to represent community-wide air quality. In addition, the following specific criteria apply:

- (1) At least one monitoring station is to be sited in a population-oriented area of expected maximum concentration.
- (2) For areas with more than one required station, a monitoring station is to be sited in an area of poor air quality.
- (3) Each State shall install and operate at least one PM_{2.5} site to monitor for regional background and at least one PM_{2.5} site to monitor regional transport.

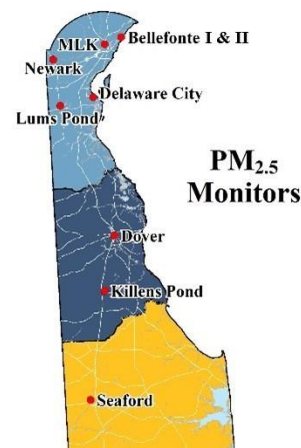


Figure 3 – DE PM_{2.5} monitoring sites

Table 3. Number of PM_{2.5} SLAMS Sites Required (based on Table D–5, Appendix D to 40 CFR Part 58, PM_{2.5} minimum monitoring requirements)

MSA/CSA Name (2020 Census Population)	County in Delaware	Delaware 2020 Census Population	Design Value		Total Required Monitors	Monitors located in EJ Commuties
			Delaware 2020 Daily/Annual Census	PM _{2.5} NAAQS: Delaware 35 / 12 Monitors		
Philadelphia-Camden Wilmington, PA-NJ-MD-DE (6,245,051)	New Castle	570,719	19 / 7.6	6	3	1
Dover, DE	Kent	181,851	15 / 7.0	2	-	1
Salisbury, MD-DE (381,868)	Sussex	237,378	16 / 7.0	1	-	1
Total in DE		989,948		9	3	3

Delaware operates more than the minimum number of required PM_{2.5} monitors at nine sites throughout the state. All monitors operate year-round. Many of these monitors are located in disparately impacted and environmental justice communities. There is one collocated site at MLK in Wilmington. The normal sampling schedule for the FRM manual method monitors is 24 hours every third day, however, at MLK samples are collected every day.

More detailed information on the PM and PM_{2.5} standards and monitoring requirements can be found on the EPA website at: <https://www.epa.gov/pm-pollution>.

Operation of all PM_{2.5} monitors in Delaware meets the requirements of 40 CFR Part 58 appendices A, C, D, and E as applicable.

Continuous PM_{2.5}

As of 1/1/2023 Delaware operates a designated FEM continuous PM_{2.5} monitor for hourly and 24-hour data at all PM_{2.5} monitoring sites. These monitors operate year-round and are collocated with an FRM PM_{2.5} monitor at MLK and Lums Pond.

Correlation of continuous PM_{2.5} FEM data with collocated FRM data:

Under the most recent revisions to the 40 CFR, Part 50, Appendix N data handling requirements, the data capture requirement for annual and daily Design Values is 75% of scheduled samples per quarter. “Creditable” data includes all PM_{2.5} data from scheduled sampling days, valid make-ups and collocated suitable monitors. This data is acceptable for comparison to the annual and daily NAAQS and computations are based on a “combined site record”. “Suitable” monitors are all monitors designated as either FRM or FEM. The PM_{2.5} data from the designated primary monitor is therefore supplemented with the average of daily data from all collocated “suitable” monitors, including continuous FEM monitors, for any missing primary monitor days.

In 2019, Delaware began replacing PM_{2.5} FRM manual method monitors with continuous PM_{2.5} FEM monitors at some sites. The NCore site at MLK in Wilmington will continue to have both FRM and FEM monitors, with the FRM monitor designated as the primary monitor. In order to meet EPA 40 CFR Part 58 appendix A requirements for FEM primary monitor collocation, in 2019 the continuous FEM at Lums Pond was designated as the primary monitor and the FRM maintained at that site as the collocated monitor.

PM_{2.5} Chemical Speciation

Chemical speciation is encouraged at sites where the chemically resolved data would be useful in developing State implementation plans and supporting atmospheric or health effects related studies. The sites in Delaware were established at MLK in Wilmington and Dover in Kent County.

In 2014 EPA completed the process of assessing the national speciation network. The purpose of the assessment was to create a network that is sustainable going forward with the current situation of reduced federal funding by redistributing resources to new or high priorities from those of low-priority or low-benefit. As part of this process, EPA developed a scoring metric to identify existing speciation sites of lower value for defunding, and the Dover site was identified as low-value due to redundancy. Speciation monitoring at the Dover site therefore ended in 2014 in response to termination of support from the EPA. Speciation monitoring continues at the MLK site in Wilmington on a one in three-day schedule.

Particulate Matter (PM₁₀)

PM₁₀ is sampled using the federal reference method (FRM) monitor similar to PM_{2.5} that operates by drawing air through a specially designed inlet that excludes particles larger than 10 microns in diameter. The particles are collected on a Teflon microfiber filter that is weighed to determine the particulate mass.

Monitoring Requirements

State, and where applicable local, agencies must operate the minimum number of required PM₁₀ monitoring sites listed in Table D-4 of 40 CFR Part 58 Appendix D. For the Philadelphia-Camden-Wilmington-Newark, PA-NJ-DE-MD MSA, the requirements are met by monitors installed in the Philadelphia urban area. No other PM₁₀ monitors are required in Delaware.

Although microscale monitoring may be appropriate in some circumstances, the most important spatial scales to effectively characterize the emissions of PM₁₀ from both mobile and stationary sources are the middle scales and neighborhood scales.

Delaware operates one PM₁₀ monitor at MLK in Wilmington to calculate PM_{coarse} concentration; therefore, PM₁₀ data is reported at Local, not Standard, temperature and pressure for consistency with PM_{2.5} collocated data.

Particulate Matter (PM_{coarse})

PM_{coarse} is calculated as the difference between concentrations of PM₁₀ and PM_{2.5} at collocated monitors. PM_{coarse} is part of the NCore monitoring at the Wilmington MLK site. Monitoring began on January 1, 2011. There are no ambient air quality standards for PM_{coarse}.

Operation of all PM₁₀ and PM_{coarse} monitors in Delaware meet the requirements of 40 CFR Part 58 appendices A, C, D, and E as applicable.

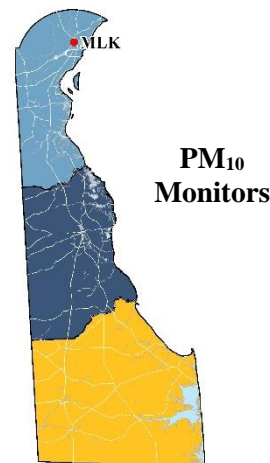


Figure 4 - DE PM₁₀ monitoring sites

Carbon Monoxide (CO)

Carbon monoxide is measured by infrared absorption photometry. Air is drawn continuously through a sample cell where infrared light passes through it. Carbon monoxide molecules in the air absorb part of the infrared light, reducing the intensity of the light reaching a light sensor. The light is converted into an electrical signal related to the concentration of carbon monoxide in the sample cell.

Monitoring Requirements

EPA revised the minimum number of required CO monitoring sites on August 12, 2011. Since Delaware does not operate a near-road urban monitoring site, Delaware is only required to monitor CO at its urban National Core (NCore) MLK monitoring site in Wilmington. The MLK NCore site is also Delaware's Photochemical Air Monitoring Site (PAMS). For the larger Philadelphia-Camden-Wilmington-Newark, PA-DE-MD MSA, the requirements are met by monitors installed in the urban Philadelphia area.

More detailed information on the CO standards and monitoring requirements can be found on the EPA website at: <https://www.epa.gov/co-pollution>.

Operation of the CO monitor at the MLK site meets the requirements of 40 CFR Part 58 appendices A, C, D, and E as applicable. The CO values are well below the ambient standards and close to the minimum detectable limits of the monitor.

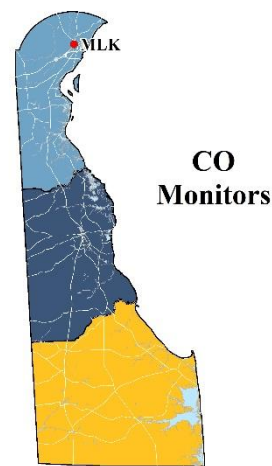


Figure 5 - DE CO monitoring sites

Sulfur Dioxide (SO₂)

Sulfur dioxide is measured with a fluorescence analyzer. Air is drawn through a sample cell where it is subjected to high intensity ultraviolet light. This causes the sulfur dioxide molecules in the air to fluoresce and release light. The fluorescence is detected with a photo multiplier tube and converted to an electrical signal proportional to the SO₂ concentration.

Monitoring Requirements

On June 2, 2010, EPA strengthened the primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO₂). The primary SO₂ standard was revised by establishing a new 1-hour standard at a level of 75 parts per billion (ppb). The new form of the standard is the 3-year average of the 99th percentile of the annual distribution of daily maximum 1-hour average concentrations.

EPA also revised the ambient air monitoring requirements for SO₂. For Delaware, the new standard required one additional monitoring site be established in Sussex County. This monitor fulfills the requirement for monitoring in the Sussex County portion of the Salisbury MD-DE metropolitan statistical area (MSA).

On August 10, 2015, the U.S. Environmental Protection Agency initialized requirements for air agencies to monitor or model ambient sulfur dioxide (SO₂) levels in areas with large sources of SO₂ emissions to help implement the 1-hour SO₂ National Air Ambient Quality Standard (NAAQS). This final rule established that, at a minimum, air agencies must characterize air quality around sources that emit 2,000 tons per year (tpy) or more of SO₂. Delaware has determined that there are no sources within the state above this threshold emissions total.

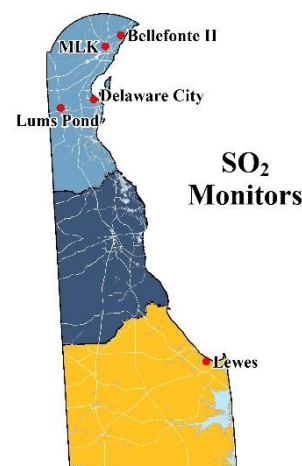


Figure 6 - DE SO₂ monitoring sites

EPA also made changes to data reporting requirements for SO₂. State and local agencies are now required to report two data values for every hour of monitoring conducted:

- the 1-hour average SO₂ concentration; and
- the maximum 5-minute block average SO₂ concentration of each hour.

More detailed information on the SO₂ standards and monitoring requirements can be found on the EPA website at: <https://www.epa.gov/so2-pollution>.

Delaware currently operates four SO₂ monitoring sites in New Castle County, which operate year-round. The fifth site in Sussex County became operational as a Special Purpose Monitor in late summer 2012 and a SLAMS on January 1, 2013. Operation of all SO₂ monitors in Delaware meets the requirements of 40 CFR Part 58 appendices A, C, D, and E as applicable.

Nitrogen Dioxide (NO₂)

Nitrogen dioxide (NO₂) can be measured indirectly via chemiluminescence reaction or directly via Cavity Attenuated Phase Shift Spectroscopy (CAPS):.

Chemiluminescence: Oxides of Nitrogen are measured using the chemiluminescence reaction of nitric oxide (NO) with ozone (O₃). Air is drawn into a reaction chamber where it is mixed with a high concentration of ozone from an internal ozone generator. Any NO in the air reacts with the ozone to produce NO₂. Light emitted from this reaction is detected with a photo multiplier tube and converted to an electrical signal proportional to the NO concentration. NO₂ is then measured indirectly; NO_x is measured by passing the air through a converter where any NO₂ in the air is reduced to NO before the air is passed to the reaction chamber. By alternately passing the air directly to the reaction chamber, and through the converter before the reaction chamber, the analyzer alternately measures NO and NO_x. The NO₂ concentration is equal to the difference between NO and NO_x.

Cavity Attenuated Phase Shift Spectroscopy (CAPS): Ambient air is drawn into the true NO₂ analyzer with a vacuum pump and particulates are removed to prevent deposition of particulate matter (PM) on the analyzer optics. The particulate scrubbed air then enters a sample cell containing highly reflective mirrors to produce a considerable path length within the cell. NO₂ in the sampled atmosphere absorbs light at 450 nm. Rather than a traditional absorbance method, where concentration is proportional to a reduction in intensity of light to the detector, a CAPS monitor measures the average delay in peak intensity of 450-nm light in the cell to quantify NO₂ concentration. The presence of NO₂ in the cell causes a delay in peak intensity that increases as the NO₂ concentration increases due to light absorption. This delay causes a phase shift of pulsed 450-nm light that is proportional to the concentration of NO₂ in the sampled atmosphere.

Monitoring Requirements

On January 22, 2010, EPA strengthened the health-based National Ambient Air Quality Standard (NAAQS) for NO₂. EPA set a new 1-hour NO₂ standard at the level of 100 parts per billion (ppb). The form for the 1-hour NO₂ standard is the 3-year average of the 98th percentile of the annual distribution of daily maximum 1-hour average concentrations. EPA also retained, with no change, the current annual average NO₂ standard of 53 ppb.

On March 14, 2013, EPA published revised monitoring requirements for NO₂. Monitoring for NO₂ is now required at near road sites in CBSAs with populations greater than 500,000, in CBSAs with populations greater than 1 million, and at NCore sites. In accordance with the new rule, Delaware is required to monitor NO₂ at its NCore MLK site in Wilmington.

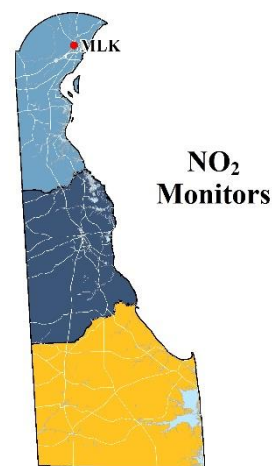


Figure 7 - DE NO₂ monitoring sites

For the larger Philadelphia-Camden-Wilmington, PA-NJ-DE-MD CBSA the requirements are met by monitors installed by the Pennsylvania Department of Environmental Protection (PADEP).

Operation of all NO₂ monitors in Delaware meets the requirements of 40 CFR Part 58 appendices A, C, D, and E as applicable.

More detailed information on the NO₂ standards and monitoring requirements can be found on the EPA website at: <https://www.epa.gov/no2-pollution>.

Total Reactive Oxides of Nitrogen (NO_y)

Oxides of Nitrogen are measured using the chemiluminescence reaction of nitric oxide (NO) with ozone (O₃). Air is drawn into a reaction chamber where it is mixed with a high concentration of ozone from an internal ozone generator. Any NO in the air reacts with the ozone to produce NO₂. Light emitted from this reaction is detected with a photo multiplier tube and converted to an electrical signal proportional to the NO concentration. NO_{Diff} must be measured indirectly. NO_y is measured by passing the air through a converter that is mounted 10 meters from ground level. Reactive Oxides of Nitrogen in the air are reduced to NO in the converter before the air is passed to the reaction chamber. By alternately bypassing and utilizing this converter before air enters the reaction chamber the analyzer alternately measures NO and NO_y. The NO_{Diff} concentration is equal to the difference between NO and NO_y.

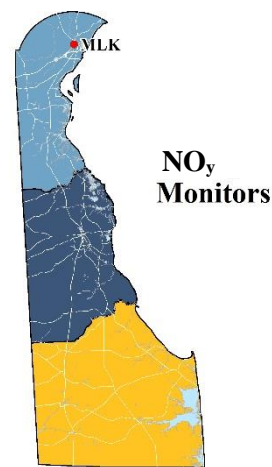


Figure 8 - DE NO_y monitoring sites

On January 1, 2011 NO_y monitoring began at the MLK site. Monitoring continues as part of the NCore and PAMS program requirements. Operation of all NO_y monitors in Delaware meet the requirements of 40 CFR Part 58 appendices A, C, D, and E as applicable.

There are no NAAQS for NO_y.

Air Toxics Pollutant Monitors

Toxic air pollutants, also called air toxics or hazardous air pollutants (HAPs) are pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects.

As part of the EPA Region III Cooperative Toxic Monitoring Program, Delaware operates one air toxic monitoring station to assess general urban levels. Toxics are sampled every sixth day year-round at the MLK site in Wilmington. The compounds measured are shown in the [Monitoring Method](#) table.

The two main classes of air toxics compounds currently monitored in Delaware are volatile organic compounds (VOCs) and heavy metals. VOC samples are collected for 24 hours in canisters with an evacuated canister sampler. The canisters are returned to the Maryland Department of the Environment laboratory for analysis on a gas chromatograph mass spectrometer system.

The heavy metals are collected for 24 hours on a total suspended particulate (TSP) quartz filter, which is sent to an analytical support laboratory³ for analysis using Inductively Coupled Plasma/Mass Spectrometry (ICP/MS). Results of the monitoring are submitted to the national Air Quality System (AQS) database.

Delaware previously included carbonyl monitoring as part of the EPA Region III program, but monitoring ended in 2015 due to problems with data quality and aging monitoring equipment. Carbonyl sampling is included as part of the PAMS Site implementation beginning in summer of 2022, see the next section for more details.

No changes to the Air Toxics program are planned for 2024.

³ A new analytical support laboratory is to be selected due to the prior laboratory shutting down at the end of 2023.

Photochemical Assessment Monitoring Station (PAMS) Monitors

The Clean Air Act (CAA) of 1990, Section 182 (c)(1), required the EPA to promulgate rules for enhanced monitoring of O₃, NO_x, and volatile organic compounds (VOCs) for O₃ nonattainment areas based on their classification with the goal of obtaining more comprehensive and representative data on O₃ air pollution.

The following information is taken and condensed from the document “PAMS Required Quality Assurance Implementation Plan”, U.S. Environmental Protection Agency, October 2016.

In 2011, the EPA initiated an effort to re-evaluate the PAMS requirements in light of changes in the needs of PAMS data users and the improvements in monitoring technology. The EPA consulted with the Clean Air Science Advisory Committee (CASAC), Air Monitoring and Methods Subcommittee (AMMS) to seek advice on potential revisions to the technical and regulatory aspects of the PAMS program, including changes to required measurements and associated network design requirements. The EPA also requested advice on appropriate technology, sampling frequency, and overall program objectives in the context of the most recently revised O₃ NAAQS and changes to atmospheric chemistry that have occurred over the previous 10 to 15 years in the significantly impacted areas.

Based on the findings of the PAMS evaluation and the consultations with the CASAC, AMMS, and National Association of Clean Air Agencies Monitoring Steering Committee (NACAA MSC), the EPA proposed to revise several aspects of the PAMS monitoring requirements. The current objective of the PAMS air monitoring program is to provide data to evaluate and support the development of air quality models and track trends in ozone precursor concentrations so as to aid ongoing efforts to attain the ozone NAAQS.

Network Design - The first part of the network design change involved EPA requiring PAMS measurements minimally during the PAMS (summer) sampling season, which is June 1 through August 31, at all NCore sites in Core-Based Statistical Areas (CBSAs) with a population of 1,000,000 people or more. The final network design will result in approximately 40 “Required” PAMS sites,

The new regulations specify that the following parameters will be measured at PAMS Required sites:

- **Volatile organic compounds (VOCs)** – It is strongly suggested that all Required PAMS sites take hourly speciated VOC measurements with auto-gas chromatographs (GCs).
- **Carbonyls** – All Required PAMS sites will conduct carbonyl sampling with a frequency of three 8-hour samples on a one-in-three-day basis (~90 samples per PAMS sampling season).
- **Nitrogen Oxides** – All Required PAMS sites must monitor for NO and NO_y (total oxides of nitrogen) in addition to true direct reading NO₂, where the latter must be measured with a cavity attenuated phase shift (CAPS) spectroscopy direct-reading NO₂ instrument or a photolytic-converter NO_x analyzer.

- **Meteorology Measurements** – All Required PAMS sites must measure wind speed and direction, temperature, humidity, atmospheric pressure, precipitation, solar radiation, ultraviolet radiation, and mixing height. A ceilometer will be used to determine the height of a cloud ceiling or cloud base (mixing height).

As part of the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD CBSA and Ozone Transport Region (OTR) Delaware is required to establish a PAMS site at the NCore site in Wilmington (MLK AQS ID 10-003-2004). As part of the PAMS network, the following measurements are required:

1. Hourly speciated VOC measurements with auto-GCs
2. Carbonyl sampling (three 8-hour samples on a one-in-three-day sampling frequency)
3. NO, true direct reading NO₂, and NO_y measurements
4. Surface meteorology measurements including mixing height

Based on 40 CFR part 58, Appendix D, state air monitoring agencies are required to begin making PAMS measurements at their NCore location(s) by the amended date of June 1, 2021 (Extension granted 12/20/2019). Due to impacts from the COVID-19 Pandemic, DE AQ had to delay 2021 and 2022 implementation. DE AQ has worked closely with the EPA to ensure plans to begin making PAMS measurements at the MLK NCore location be met by June 1, 2023.

Appendix A reports on the design and implementation status of all required PAMS equipment. All required monitoring equipment was acquired by the end of 2023 and support equipment acquisition is continuing as funding becomes available.

Enhanced Monitoring Program (EMP) - for OTR states

EPA developed a Technical Note “Guidance for Photochemical Assessment Monitoring Stations (PAMS) Required Network Implementation Plans and Enhanced Monitoring Plans (EMPs)” that recommends monitoring organizations submit the EMP by July 1, 2018 along with the annual network plan. The actual regulatory requirement for EMP contained in 50 CFR 58, Appendix D.5(h) states that “the EMP shall be submitted to the EPA Regional Administrator no later than October 1, 2019” for states in the Ozone Transport Region.

In recognition of EPA's guidance recommending an earlier EMP submittal DE is proposing the following measurements be considered basic elements of the required EMP:

- Year-round NO₂ monitoring via Chemiluminescence NO_x analyzer at the Lewes site beginning in 2024.⁴
- Year-round 24-hour VOC sample collection via TO-15 method at the existing NCore site.⁵
- O₃ monitoring at a greater number sites than is minimally required by the EPA⁶
- Enhanced upper-air measurements of meteorology or pollution concentrations⁷

Collection and reporting of these measurements will be contingent on receipt of sufficient additional EPA funding.

⁴ Year-round NO₂ monitoring via Chemiluminescence NO_x analyzer deployment has at Lewes was originally planned in 2019. Deployment has been delayed multiple years by persistent programmatic delays including: COVID-19 office closures, equipment failures, and staff retirements

⁵ Requirement is met by current 1-in-6 day VOC sampling performed year-round at MLK Jr. Blvd. monitoring site

⁶ Requirement is met by existing O₃ monitoring network. See Table 2, pg. 14

⁷ Requirement is met by year-round operation of Vaisala CL51 Ceilometer deployed at MLK Jr. Blvd. monitoring site and inclusion of Delaware's data in the national Unified Ceilometer Network

Summary of Changes

Changes from 2023

Following are the changes to the monitoring network in 2023:

- Site upgrades: Ambient monitoring shelters and platforms were replaced at two sites in 2023 to address deterioration and safety concerns. No site was relocated at the time of replacement.
 - Lewes air monitoring shelter: shelter replaced and platform upgraded
 - Killens Pond State Park: shelter replaced and platform upgraded
 - MLK Jr. Blvd. monitoring site: deployed the older Killens Pond monitoring shelter as secondary building for housing several PAMS analyzers
- Monitor changes:
 - Primary Ozone analyzer at Bellevue State Park upgraded to a modernized version of the other ozone analyzers deployed in Delaware; modern version is under evaluation for network adoption.
 - A new FEM PM_{2.5} analyzer was deployed at Bellevue State Park.

Changes anticipated for 2024-2025

Delaware plans the following network changes:

- Delaware plans to upgrade and relocate the monitoring shelter at Brandywine Creek State Park site.
 - Upgrade is proposed to address issues with operator access to the roof and water ingress and the condition of the meteorological tower.
 - Relocation is proposed to address issues with site access and electrical service outages.
- Monitor Changes:
 - Deploy NO_x/NO₂ analyzer at Lewes for the Enhanced Monitoring Plan
 - Deploy an upgraded continuous particulate matter analyzer (Teledyne T640X) that collects regulatory concentration data for PM₁₀ and PM_{coarse}.
 - Replace aging and nearly obsolete O₃ monitor at Lums Pond with new, modernized model
 - Replace aging and nearly obsolete SO₂ analyzers at MLK and Lums Pond with new models⁸
 - Upgrade the aging NO_y analyzer at MLK
 - Replace the failed CO analyzer at MLK
- Inflation Reduction Act Grant:
 - Delaware has applied for grant funding from the Inflation Reduction Act to facilitate network maintenance and replace aging equipment
 - New equipment was ordered in December 2023
 - Several pieces of monitoring equipment are planned for deployment in 2024

⁸ Deployment of new SO₂ analyzers was planned in 2023 but has been delayed by equipment failures and poor quality control of instruments Delaware received.

Detailed Site Descriptions

The following pages contain additional site-specific information on all active SLAMS monitoring sites in Delaware.

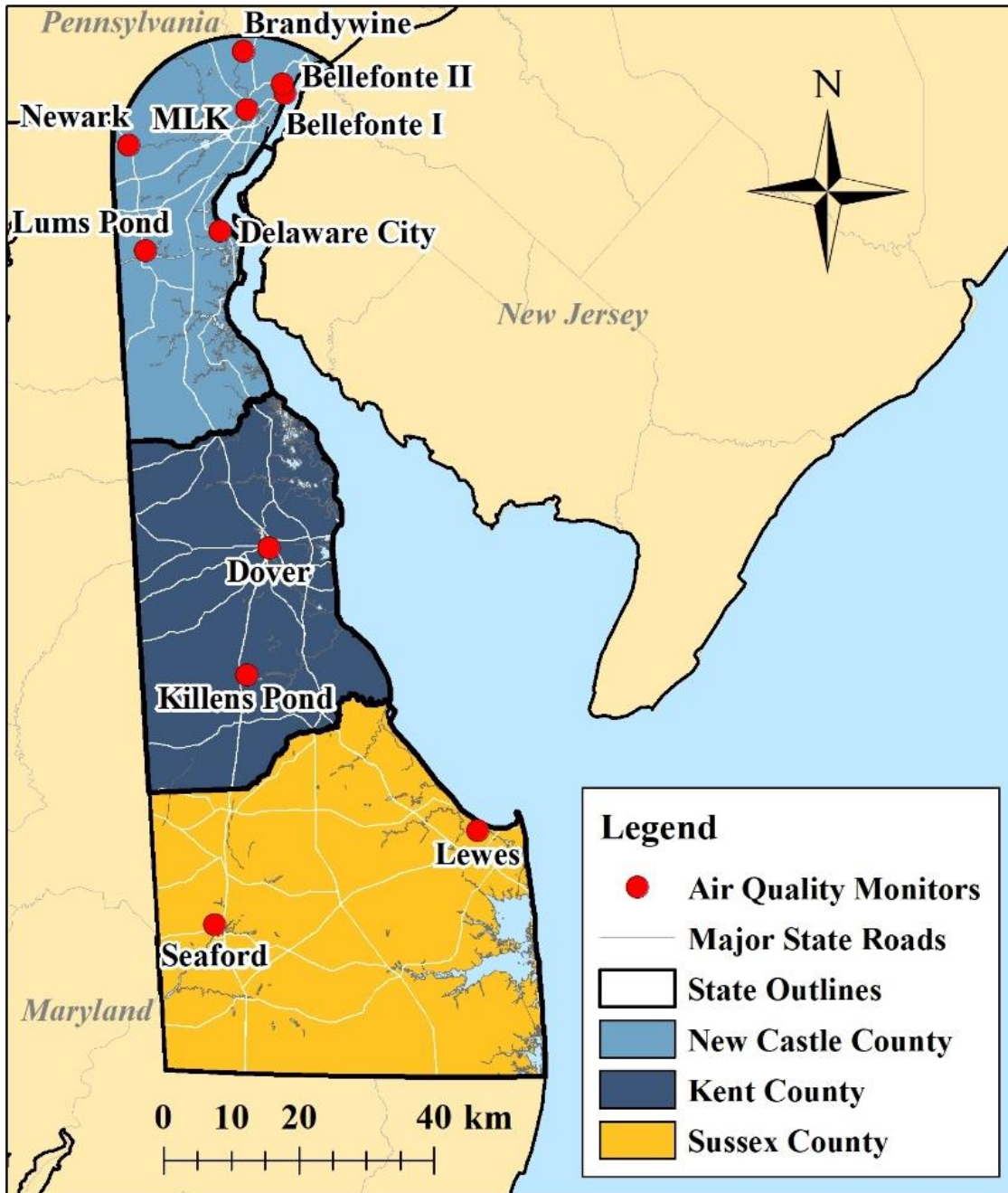


Figure 9 – Air Quality Monitoring Sites in Delaware

Site: Brandywine (BCSP)



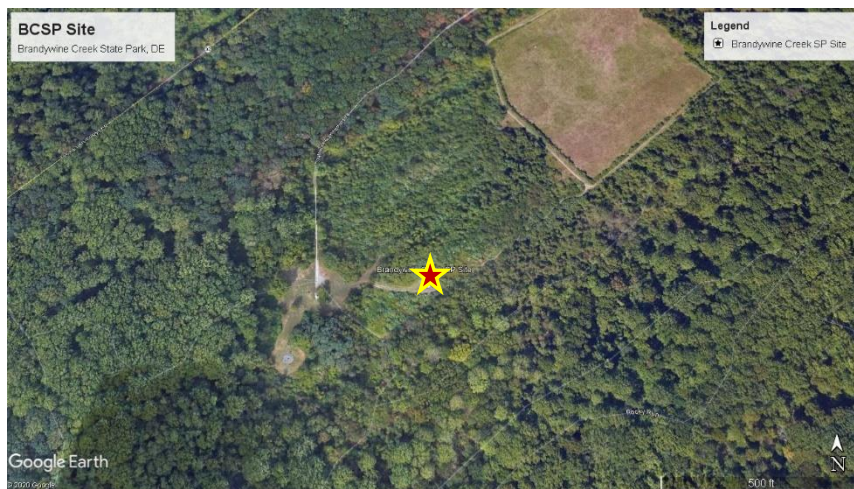
AQS Site ID: 10-003-1010
State: Delaware
County: New Castle
Address: Brandywine Creek State Park, Wilmington

Latitude: 39.8172
Longitude: -75.5639

Spatial Scale: Neighborhood
Area Represented: Philadelphia-Camden-Wilmington,
(MSA) PA-NJ-DE-MD

Year Established: 1994

Figure 10 - BCSP monitoring site in DE



Monitored Parameters

O₃ Ozone
WS / WD Wind Speed & Direction
T / Rh Temperature & Relative Humidity

Site Description

The Brandywine site is located in Brandywine Creek State Park and was established when a secondary downwind site in Claymont was discontinued due to changes in nearby land use and ownership. This is a neighborhood scale site for O₃ monitoring. This site meets all EPA 40 CFR Part 58 App D and E siting criteria.

Monitoring Objectives

Population exposure, maximum concentration, O₃ NAAQS compliance, and trends.

Planned Changes through 2024

Replace monitoring shelter to address recurring issues with water ingress and propose relocation within park to improve site access.

Site: Bellefonte I (Platform) & II

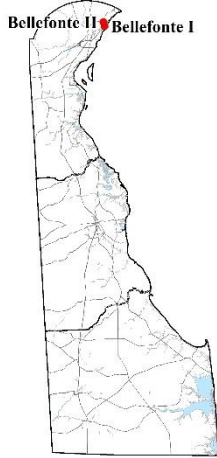


Figure 11 - Bellefonte I and II monitoring sites in DE

AQS Site ID: BF I – 10-003-1003
BF II – 10-003-1013

State: Delaware

County: New Castle

Address: BF I – River Road Park
BF II – Bellevue State Park

Latitude: BF I – 39.7613
BF II – 39.7739

Longitude: BF I – -75.4920
BF II – -75.4965

Spatial Scale: Neighborhood

Area Represented: Philadelphia-Camden-Wilmington,
(MSA) PA-NJ-DE-MD

Year Established: BF I – 1969
BF II – 2001



← Bellefonte II

↓ Bellefonte I



Monitored Parameters

Bellefonte I	PM_{2.5}	Particulate Matter: 24-hour (Microns < 2.5)
Bellefonte II	PM_{2.5}	Particulate Matter: 24-hour (Microns < 2.5)
	O₃	Ozone
	SO₂	Sulfur Dioxide

Site Description

Bellefonte was originally established in 1969 to monitor O₃ (primary downwind direction from Wilmington) and SO₂. PM_{2.5} was added in 1999. When changing site characteristics began to interfere with ozone monitoring, a new site (Bellefonte II) was established in 2001, less than a mile to the north. The O₃ and SO₂ monitors were relocated to the new site, while the PM_{2.5} monitor remained at the original site to provide data continuity. Both sites meet all EPA 40 CFR Part 58 App D and E siting criteria.

Monitoring Objectives

Monitoring objectives are NAAQS compliance, population exposures, and trends. Bellefonte II is the O₃ maximum downwind concentration site for Wilmington. The SO₂ monitor is sited for general population exposure and trends, with major point sources located to the northeast in Marcus Hook, PA and to the south in Edgemoor.

Planned Changes through 2024

No changes planned.

Site: MLK NCore (Wilmington)



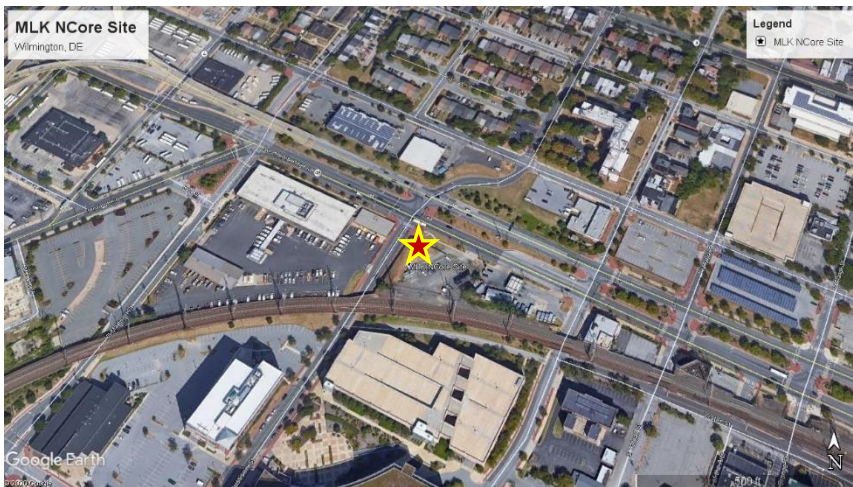
AQS Site ID: 10-003-2004
State: Delaware
County: New Castle
Address: Justison St. & MLK Blvd., Wilmington

Latitude: 39.7395
Longitude: -75.5575

Spatial Scale: Neighborhood
Area Represented: Philadelphia-Camden-Wilmington,
(MSA) PA-NJ-DE-MD

Year Established: 1999

Figure 12 - MLK monitoring site in DE



Monitored Parameters

- O₃** Ozone
- SO₂** Sulfur Dioxide
- CO** Carbon Monoxide
- NO₂** Nitrogen Dioxide
- NO_y** Total Reactive Oxides of Nitrogen
- PM_{2.5}, PM₁₀, PM_{10-2.5}** Particulate Matter: Hourly & 24-hour (Microns < 2.5, 10, & Coarse =10-2.5)
- PM_{2.5} Spec.** Particulate Matter 2.5 Speciation
- PM_{2.5} BC** Particulate Matter 2.5 Speciation – Black Carbon
- TSP** Total Suspended Particulate Matter
- VOC** Volatile Organic Compounds: 24-hour via TO-15 method
Volatile Organic Compounds: hourly via Automated Gas Chromatography
- C=O** Carbonyls: 8-hour via TO-11a method
- WS / WD** Wind Speed & Direction
- T / Rh** Temperature & Relative Humidity
- MLH** Mixing Layer Height: hourly via Ceilometer - Unified Ceilometer Network

Site Description

The MLK site is within the city of Wilmington, DE at the intersection of Justison St. and MLK Blvd. It replaced another urban site at 12th and King Streets that had operated at that location for over 20 years and was discontinued due to a change in land ownership. The MLK site is the state National Core (NCore) site and represents urban population exposure to multiple pollution sources. It is also the state Photochemical Assessment Monitoring Station (PAMS) site. This site meets all EPA 40 CFR Part 58 App D and E siting criteria

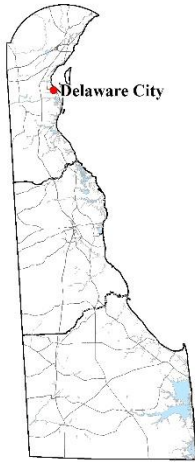
Monitoring Objectives

Population exposure, maximum concentration, NAAQS compliance, NCore, and trends. PAMS beginning 2023.

Planned Changes through 2024

Continued implementation of PAMS program equipment and deployment of secondary PAMS air monitoring shelter. Deployment of continuous FEM PM₁₀ / PM_{coarse} analyzer (Teledyne model T640X) to provide real-time measurements and colocation of existing PM₁₀ / PM_{coarse} sampling.

Site: Delaware City (Rt 9)



AQS Site ID: 10-003-1008
State: Delaware
County: New Castle
Address: Route 9, Delaware City

Latitude: 39.5777
Longitude: -75.6036

Spatial Scale: Neighborhood
Area Represented: Philadelphia-Camden-Wilmington,
 (MSA) PA-NJ-DE-MD

Year Established: 1992

Figure 13 - Delaware City monitoring site in DE



Monitored Parameters

- SO₂** Sulfur Dioxide
- PM_{2.5}** Particulate Matter: Hourly (Microns < 2.5)
- WS / WD** Wind Speed & Direction
- T / Rh** Temperature & Relative Humidity

Site Description

The Delaware City site was established at a location along Route 9 that is between the Delaware City industrial complex and the nearest populated area (Delaware City) in the predominant downwind direction. This site meets all EPA 40 CFR Part 58 App D and E siting criteria.

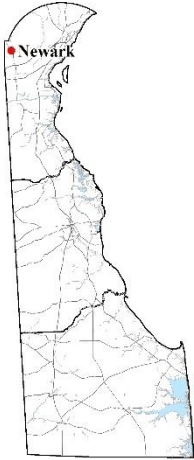
Monitoring Objectives

This monitoring site is a stationary source-impacted site for SO₂. The monitoring objectives are population exposure, compliance with the NAAQS, and trends.

Planned Changes through 2024

Install a 10-meter meteorological tower to improve representativeness of wind speed and direction measurements.

Site: Newark (Platform)



AQS Site ID: 10-003-1012

State: Delaware

County: New Castle

Address: University of Delaware North Campus, Newark

Latitude: 39.6916

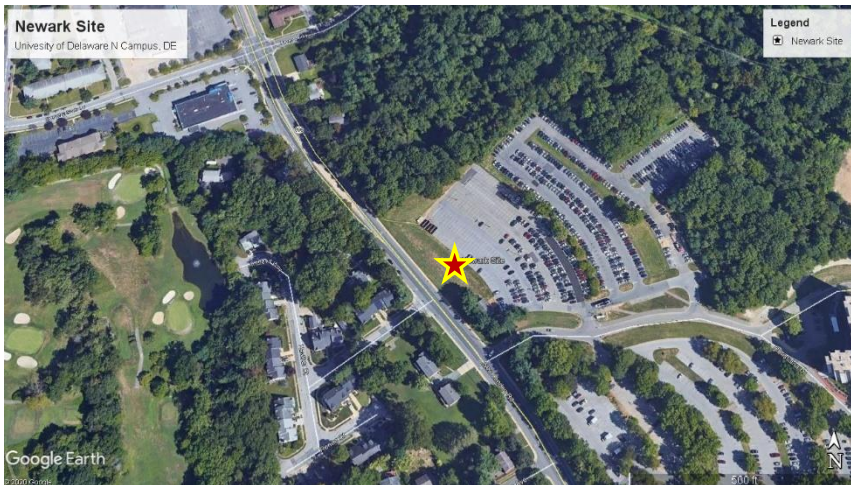
Longitude: -75.7617

Spatial Scale: Neighborhood

Area Represented: Philadelphia-Camden-Wilmington,
(MSA) PA-NJ-DE-MD

Year Established: 1999

Figure 14 - Newark monitoring platform in DE



Monitored Parameters

PM_{2.5} Particulate Matter: Hourly (Microns < 2.5)

Site Description

The Newark site is a platform only and was established to understand PM_{2.5} concentrations in the Newark area and potentially transported PM_{2.5} from upwind areas to the west. It is a PM_{2.5} neighborhood scale site. The location is suburban and generally impacted by mobile sources and regional transport. This site meets all EPA 40 CFR Part 58 App D and E siting criteria.

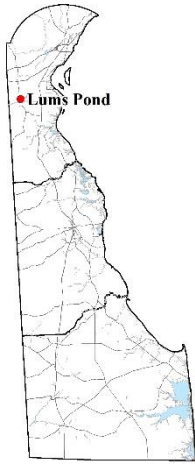
Monitoring Objectives

Population exposure, PM_{2.5} NAAQS compliance, regional transport, and trends.

Planned Changes through 2024

No changes planned.

Site: Lums Pond



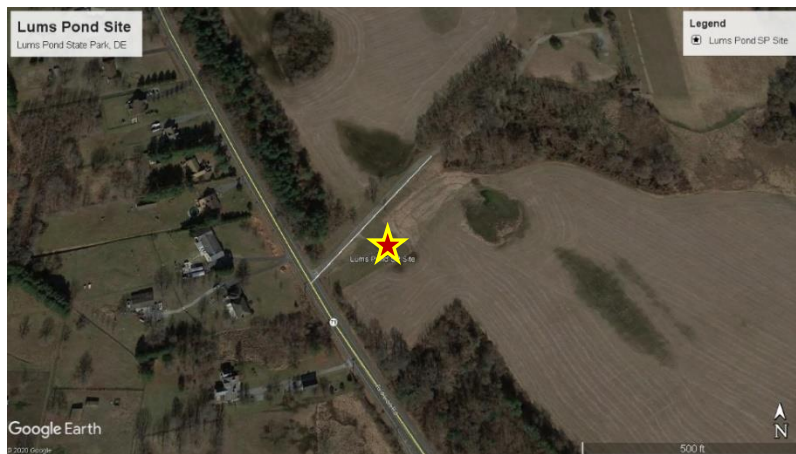
AQS Site ID: 10-003-1007
State: Delaware
County: New Castle
Address: Lums Pond State Park, Bear

Latitude: 39.5513
Longitude: -75.7320

Spatial Scale: Urban
Area Represented: Not in an urban area (MSA)

Year Established: 1991

Figure 15 - Lums Pond monitoring site in DE



Monitored Parameters

- O₃** Ozone
- SO₂** Sulfur Dioxide
- PM_{2.5}** Particulate Matter: Hourly & 24-hour (Microns < 2.5)
- WS / WD** Wind Speed & Direction
- T / Rh** Temperature & Relative Humidity

Site Description

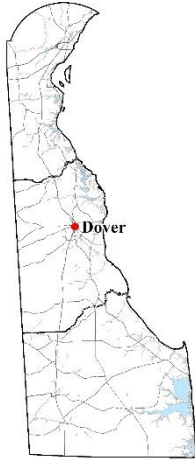
The Lums Pond site was originally neighborhood scale located in a general upwind direction from Wilmington. The scale of representation was changed to Urban (4 – 50 km) to reflect the background and transport monitoring objectives. The immediate area is rural. This site meets all EPA 40 CFR Part 58 App D and E siting criteria.

Monitoring Objectives

The site objectives for O₃ are upwind background for the Wilmington area, population exposure, NAAQS compliance, and trends. This site was originally planned to monitor O₃ transported into Delaware from the Baltimore/Washington area, and continues to serve this purpose. The SO₂ monitor was added in 2000 to detect impacts from major point sources directly to the east. PM_{2.5} monitoring began in 1999 as both a regional transport and general population exposure site, as well as for NAAQS compliance.

Planned Changes through 2024

No changes planned.

Site: Dover (Platform)

AQS Site ID: 10-001-0003
State: Delaware
County: Kent
Address: Water St., Dover

Latitude: 39.1556
Longitude: -75.5182

Spatial Scale: Neighborhood
Area Represented: Dover
 (MSA) DE

Year Established: 1999

Figure 16 - Dover monitoring platform in DE

**Monitored Parameters**

PM_{2.5} Particulate Matter: Hourly (Microns < 2.5)

Site Description

The Dover site is a platform only and was established to understand fine particulate concentrations in the Dover area. It is a neighborhood scale site representative of the Dover MSA impacted by a combination of source types including mobile, large and small point sources. This site meets all EPA 40 CFR Part 58 App D and E siting criteria.

Monitoring Objectives

Population exposure, PM_{2.5} NAAQS compliance, and trends.

Planned Changes through 2024

No changes planned.

Site: Killens Pond



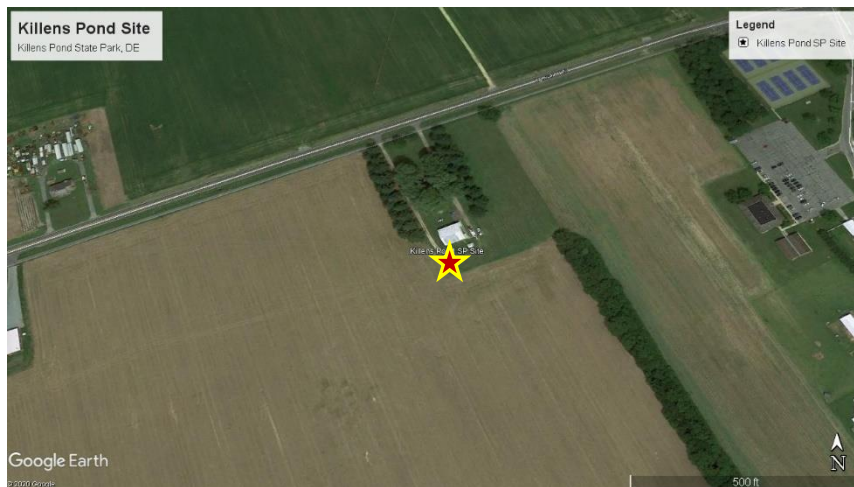
AQS Site ID: 10-001-0002
State: Delaware
County: Kent
Address: Killens Pond State Park, Felton

Latitude: 38.9867
Longitude: -75.5568

Spatial Scale: Urban
Area Represented: Not in an urban area (MSA)

Year Established: 1995

Figure 17 - Killens Pond monitoring site in DE



Monitored Parameters

- O₃** Ozone
- PM_{2.5}** Particulate Matter: Hourly (Microns < 2.5)
- WS / WD** Wind Speed & Direction

Site Description

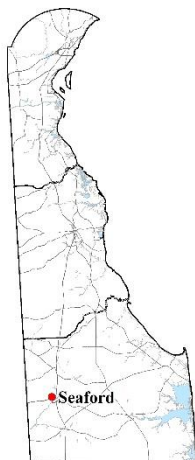
The Killens Pond site is located in a rural area that is part of Killens Pond State Park. It was established to understand background concentrations of O₃ and PM_{2.5}. The scale of representation was changed to Urban (4 – 50 km) to reflect the background monitoring objective. This site meets all EPA 40 CFR Part 58 App D and E siting criteria.

Monitoring Objectives

Background concentrations, NAAQS compliance, and trends.

Planned Changes through 2024

No changes planned.

Site: Seaford

AQS Site ID: 10-005-1002
State: Delaware
County: Sussex
Address: 350 Virginia Ave., Seaford

Latitude: 38.6539
Longitude: -75.6106

Spatial Scale: Neighborhood
Area Represented: Salisbury,
 (MSA) MD-DE

Year Established: 1990

Figure 18 - Seaford monitoring site in DE

**Monitored Parameters**

O₃ Ozone
PM_{2.5} Particulate Matter: Hourly (Microns < 2.5)
WS / WD Wind Speed & Direction

Site Description

The Seaford site was originally located to monitor pollutant concentrations in the Seaford area. The original site was located further south, near the Seaford water tower. It was relocated to the present location in 1990 due to deteriorating conditions at the original site. The current site is neighborhood scale and is suburban. The site is impacted by local point sources, mobile sources, and regional transport. This site meets all EPA 40 CFR Part 58 App D and E siting criteria.

Monitoring Objectives

Population exposure, NAAQS compliance, and trends.

Planned Changes through 2024

No changes planned.

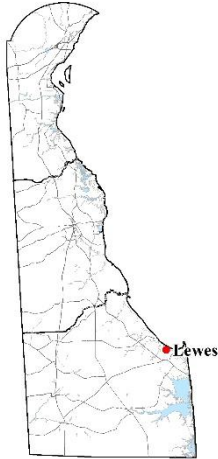
Site: Lewes**AQS Site ID:** 10-005-1003**State:** Delaware**County:** Sussex**Address:** University of Delaware: College of Earth, Ocean, & Environment - Hugh R. Sharp Campus, Lewes**Latitude:** 38.7791**Longitude:** -75.1632**Spatial Scale:** Neighborhood**Area Represented:** Salisbury,
(MSA) MD-DE**Year Established:** 1991

Figure 19 - Lewes monitoring site in DE

**Monitored Parameters**

O₃	Ozone
SO₂	Sulfur Dioxide
WS / WD	Wind Speed & Direction
T / Rh	Temperature & Relative Humidity

Site Description

The Lewes site is neighborhood scale established to understand O₃ concentrations in the coastal area where population increases significantly in the summer months. SO₂ was added in 2012 in response to the new SO₂ NAAQS monitoring requirements. It is representative of the coastal Sussex County area. This site meets all EPA 40 CFR Part 58 App D and E siting criteria.

Monitoring Objectives

Population exposure, NAAQS compliance, and trends.

Planned Changes through 2024

A NO₂ Chemiluminescence analyzer will be added as part of the Enhanced Monitoring Plan.

Monitoring method information

Monitor Methods & AQS Codes

Table 4. Monitoring methods and associated AQS codes used in the Delaware ambient air monitoring network

Parameter AQS code	AQS Method Code	Method Description/ Analysis Method
O ₃ - 44201	047 – TE 49i 087 – TAPI N400	UV Absorption
SO ₂ - 42401	560 – TE 43i-TLE 100 – TAPI T100U	UV Fluorescence
CO - 42101	593 – TAPI T300U ⁹	Non-dispersive Infrared
NO ₂ – 42602	574 – TE 42i-TL 256 - TAPI N500	Chemiluminescence Cavity Attenuated Phase Shift (CAPS) Spectroscopy
NO _y - 42600	674 – TE 42i-Y	Chemiluminescence
PM _{2.5} - 88101	145 – TE Partisol 2025i VSCC Inlet 236 – TAPI T640 (continuous)	Gravimetric Continuous broadband spectroscopy
*PM _{2.5} Speciation – Ions	812 – Met One SASS	Nylon filter, Ion chromatography
*PM _{2.5} Speciation – Metals	811 – Met One SASS	Teflon filter, energy dispersive XRF
*PM _{2.5} Speciation – Carbon	839 – URG 3000N	Quartz filter and cyclone inlet; IMPROVE carbon Thermal Optical Reflectance (TOR) analysis method
PM ₁₀ – 85101 local conditions	127 – TE Partisol 2025i	Gravimetric
PMcoarse – 86101 PM10-2.5 local conditions	176 – TE Partisol 2025i Sequential	Calculated from paired samplers
Air Toxics – VOCs	150 – SS 6L – Pressurized Canister	Cryogenic pre-concentration: GC/MS
*Air Toxics – Metals	089 – High-Volume TSP	ICP/MS Quartz filters
WS – 61103 WD - 61104	020 – Vaisala vector method	Ultrasonic

* Multiple parameters in this group; see next table for list of compounds.

⁹ Delaware's TAPI T300U Carbon Monoxide analyzer failed in 2023 and has not yet been replaced due to funding constraints.

Table 5. Parameters with multiple compounds. Note that all parameter codes can be found online:

https://aqs.epa.gov/aqsweb/documents/codetables/methods_all.html

Group	Compounds
VOCs	Dichlorodifluoromethane, Chloromethane, 1,2-Dichloro-1,1,2,2-tetrafluoroeth, Chloroethene, 1,3-Butadiene, Trichlorofluoromethane, Acetone, Methylene Chloride, 1,1,2-Trichloro-1,2,2-trifluoroethane, 2-methoxy-2-methyl-Propane, Hexane, Chloroform, Tetrahydrofuran, 1,2-Dichloroethane, 1,1,1-Trichloroethane, Benzene, Carbon tetrachloride, Cyclohexane, 1,2-Dichloropropane, Trichloroethene, Heptane, Cis-1,3-Dichloro-1-Propene, Trans-1,3-Dichloro-1-Propene, Toluene, 1,2-Dibromoethane, Tetrachloroethylene, Chlorobenzene, Ethylbenzene, m & p-Xylene, Styrene, 1,1,2,2-Tetrachloroethane, o-Xylene, 1-Ethyl-4-Methylbenzene, 1,3,5-Trimethylbenzene, 1,2,4-Trimethylbenzene, 1,4-Dichlorobenzene
Metals	Arsenic (12103), Cadmium (12110), Chromium (12112), Lead (12128), Manganese (12132), Nickel (12136)
PM _{2.5} Speciation	<p>Ions: Ammonium, Nitrate, Sulfate, Potassium, Sodium</p> <p>Carbon: Elemental carbon (E1 IMPROVE, E2 IMPROVE, E3 IMPROVE, EC IMPROVE TOR, EC IMPROVE TOT) Organic carbon (O1 IMPROVE, O2 IMPROVE, O₃ IMPROVE, O4 IMPROVE, OC IMPROVE TOR, OC IMPROVE TOT, OP IMPROVE TOR), OP IMPROVE TOT, TC IMPROVE</p> <p>Elements: Aluminum, Antimony, Arsenic, Barium, Bromine, Cadmium, Calcium, Cerium, Cesium, Chlorine, Chromium, Cobalt, Copper, Europium, Gallium, Gold, Hafnium, Indium, Iridium, Iron, Lanthanum, Lead, Magnesium, Manganese, Mercury, Molybdenum, Nickel, Niobium, Phosphorus, Potassium, Rubidium, Samarium, Scandium, Selenium, Silicon, Silver, Sodium, Strontium, Sulfur, Tantalum, Terbium, Tin, Titanium, Vanadium, Wolfram, Yttrium, Zinc, and Zirconium</p>

Ozone (O₃)

Ozone is measured by ultraviolet absorption photometry. Air is drawn through a sample cell where ultraviolet light (254 nm wavelength) passes through it. Light not absorbed by the ozone is converted into an electrical signal proportional to the ozone concentration.

Sulfur Dioxide (SO₂)

Sulfur dioxide is measured with a fluorescence analyzer. Air is drawn through a sample cell where it is subjected to high intensity ultraviolet light. This causes the sulfur dioxide molecules in the air to fluoresce and release light. The fluorescence is detected with a photo multiplier tube and converted to an electrical signal proportional to the SO₂ concentration.

Carbon Monoxide (CO)

Carbon monoxide is measured by infrared absorption photometry. Air is drawn continuously through a sample cell where infrared light passes through it. Carbon monoxide molecules in the air absorb part of the infrared light, reducing the intensity of the light reaching a light sensor. The light is converted into an electrical signal related to the concentration of carbon monoxide in the sample cell.

Nitrogen Dioxide (NO₂)

- **Chemiluminescence Reaction**

Nitrogen oxides are measured using the chemiluminescence reaction of NO with O₃. Air is drawn into a reaction chamber where it is mixed with a high concentration of ozone from an internal ozone generator. Any NO in the air reacts with the ozone to produce NO₂. Light emitted from this reaction is detected with a photo multiplier tube and converted to an electrical signal proportional to the NO concentration. NO₂ must be measured indirectly.

NO₂ is measured by passing the air through a converter where any NO₂ in the air is reduced to NO before the air is passed to the reaction chamber. By alternately passing the air directly to the reaction chamber, and through the converter before the reaction chamber, the analyzer alternately measures NO and NO_x. The NO₂ concentration is equal to the difference between NO and NO_x.

- **Cavity Attenuated Phase Shift Spectroscopy (CAPS)**

Ambient air is drawn into the true NO₂ analyzer with a vacuum pump and particulates are removed to prevent deposition of particulate matter (PM) on the analyzer optics. The particulate scrubbed air then enters a sample cell containing highly reflective mirrors to produce a considerable path length within the cell. NO₂ in the sampled atmosphere absorbs light at 450 nm. Rather than a traditional absorbance method, where concentration is proportional to a reduction in intensity of light to the detector, a CAPS monitor measures the average delay in peak intensity of 450-nm light in the cell to quantify NO₂ concentration. The presence of NO₂ in the cell causes a delay in peak intensity that increases as the NO₂ concentration increases due to light absorption. This delay causes a phase shift of pulsed

450-nm light that is proportional to the concentration of NO₂ in the sampled atmosphere.

Total Reactive Oxides of Nitrogen (NO_y)

NO_y is measured by the same method as NO_x with the exception that the converter is at the sample inlet mounted 10 meters above ground level instead of at the instrument's reaction chamber. This position is used because the NO_y compounds are too unstable to be measured when taken in through the entire length of the typical ambient air sampling inlet system. Placing the converter at the inlet allows the catalytic reaction to convert most of the NO_y species (approximately 30 nitroxyl compounds) to NO very close to the point where ambient air is sampled. The more stable NO can then be detected as described previously.

Particulate Matter - Fine (PM_{2.5}), PM₁₀, and PM_{coarse}

PM_{2.5} is sampled by drawing air through a specially designed inlet that excludes particles larger than 2.5 microns in diameter. The particles are collected on a Teflon microfiber filter that is weighed to determine the particulate mass. The normal sampling schedule is 24 hours every third day, however, at one site (Wilmington-MLK) PM_{2.5} samples are collected for 24 hours every day.

- PM_{2.5} with the Teledyne T640 continuously measures particulate mass using a light-scattering spectroscopy method.
- PM₁₀ samples are collected using the same general method as PM_{2.5} with a specially designed inlet that excludes particles larger than 10 microns in diameter. Samples are collected every third day.
- PM_{coarse} is calculated by subtracting the PM_{2.5} concentration from the collocated PM₁₀ concentration for the same day.

PM_{2.5} Speciation

Some of the gravimetric PM_{2.5} monitors are specially equipped to collect PM_{2.5} samples which are later analyzed into concentrations of the samples' chemical constituents or species. MetOne Super SAAS samplers and URG 3000N samplers are used for the collection of samples for the chemical speciation of PM_{2.5}. The samplers collect 3 samples simultaneously every third day for a period of 24 hours. These samples are then sent to an EPA contract laboratory for chemical analyses. There are over 50 species consisting of ions, elements, and carbon species quantified by the analyses.

PM_{2.5} Speciation – Black Carbon

Black Carbon is measured continuously using an Aethalometer, which collects a PM_{2.5} sample on a spool of white quartz filter tape. As the particulate matter collects on the tape, a circle where visible and ultra-violet light is absorbed appears. The rate of 'darkening' of this spot is proportional to the concentration of black carbon, a component of PM_{2.5} that includes combusted hydrocarbons and other materials.

VOCs

Air toxics samples are collected for 24 hours in canisters with an ATEC 2200 canister sampler on a one in six-day schedule. A duplicate sample is collected on a one in twelve-day schedule. The canisters are returned to the Maryland Department of the Environment laboratory for analysis on an Entech/Agilent gas chromatograph mass spectrometer system.

Metals

Metals are collected for 24 hours with a high-volume TSP sampler on a quartz filter on a one in six-day schedule. The filter is sent to a contract laboratory for analysis of total weight and metal component concentrations using ICP/MS.

Appendix A

PAMS Monitoring Implementation Network Plan - Delaware

Delaware Division of Air Quality (DAQ) plans to operate one Photochemical Assessment Monitoring Stations (PAMS) site in the air monitoring network in 2023 at the Delaware NCore MLK site in Wilmington in accordance with the revised monitoring rule (80 FR 65292; October 26, 2015) which requires PAMS measurements June 1 through August 31 at NCore sites that are located in Core-Based Statistical Areas (CBSAs) with populations of 1,000,000 or more.

Network Decision

The NCore site located at MLK site id 10-003-2004 will serve as the location of the required PAMS site and will measure the following parameters described below. Table A-2 provides an inventory and explanation of equipment used at the site.

Auto GC Decision

Volatile organic compounds (VOCs) – A complete list of the targeted compounds are found in Table 1. Delaware measures hourly speciated VOC measurements with an auto-gas chromatograph (GC) using the Consolidated Analytical Systems (CAS) integrated Chromatotec AirmOzone Auto-Gas Chromatograph with Flame Ionization Detection (Auto-GC-FID).

Meteorology Measurements Decision

Delaware measures wind direction, wind speed, temperature, humidity, atmospheric pressure, precipitation, solar radiation, ultraviolet radiation, and mixing height. The following instrumentation has been implemented to measure these parameters:

- Vaisala WXT530 – WS/WD, Temperature, Humidity, Pressure
- Vaisala Ceilometer CL51 – Mixing Height
- Kipp & Zonen SUV5-V Smart Broadband UV– UV Radiation
- Kipp & Zonen SMP10-V Smart Pyranometer – Solar Radiation
- RM Young 52202 Tipping rain gauge – Precipitation

Other Required Measurements

Carbonyls - A complete list of the target carbonyl compounds is found in Table 1. The TO-11A sampling and analytical method, as used in the National Air Toxics Trends (NATTS) program¹⁰ will be used. Carbonyl sampling at a frequency of three 8-hour samples on a one-in-three day basis (~90 samples per PAMS sampling season) using:

- ATEC Model 8000-2 Eight Port Carbonyl Sampler with additional Duplicate Channel.

¹⁰ See NATTS Technical Assistance Document for TO-11A method.

Nitrogen Oxides – Delaware monitors NO and NO_y (total oxides of nitrogen) in addition to direct NO₂. Direct NO₂ is required to be measured using either a cavity attenuated phase shift (CAPS) spectroscopy or photolytic-converter NO_x analyzer. Delaware has elected to use:

- Direct NO₂: Teledyne Model N500 CAPS NO_x Analyzer
- NO and NO_y: Thermo Fisher Scientific 42i-Y Chemiluminescence analyzer.

Table A-1. PAMS Target Compound List

Priority Compounds			Optional Compounds				
1	1,2,3-trimethylbenzene ^a	19	n-hexane ^b	1	1,3,5-trimethylbenzene	19	m-diethylbenzene
2	1,2,4-trimethylbenzene ^a	20	n-pentane	2	1-pentene	20	methylcyclohexane
3	1-butene	21	o-ethyltoluene ^a	3	2,2-dimethylbutane	21	methylcyclopentane
4	2,2,4-trimethylpentane ^b	22	o-xylene ^{a,b}	4	2,3,4-trimethylpentane	22	n-decane
5	acetaldehyde ^{b,c}	23	p-ethyltoluene ^a	5	2,3-dimethylbutane	23	n-heptane
6	acetone ^{c,d}	24	Propane	6	2,3-dimethylpentane	24	n-nonane
7	benzene ^{a,b}	25	propylene	7	2,4-dimethylpentane	25	n-octane
8	c-2-butene	26	styrene ^{a,b}	8	2-methylheptane	26	n-propylbenzene ^a
9	ethane ^d	27	toluene ^{a,b}	9	2-methylhexane	27	n-undecane
10	ethylbenzene ^{a,b}	28	t-2-butene	10	2-methylpentane	28	p-diethylbenzene
11	Ethylene			11	3-methylheptane	29	t-2-pentene
12	formaldehyde ^{b,c}			12	3-methylhexane	30	α/β-pinene
13	Isobutane			13	3-methylpentane	31	1,3 butadiene ^b
14	Isopentane			14	Acetylene	32	benzaldehyde ^c
15	Isoprene			15	c-2-pentene	33	carbon tetrachloride ^b
16	m&p-xylenes ^{a,b}			16	cyclohexane	34	Ethanol
17	m-ethyltoluene ^a			17	cyclopentane	35	Tetrachloroethylene ^b
18	n-butane			18	isopropylbenzene ^b		

Source: Revisions to the Photochemical Assessment Monitoring Stations Compound Target List. U.S. EPA, November 20, 2013

^a Important SOAP (Secondary Organic Aerosols Precursor) Compounds

^b HAP (Hazardous Air Pollutant) Compounds

^c Carbonyl compounds

^d Non-reactive compounds, not considered to be VOC for regulatory purposes

Table A-2. Equipment Inventory (specific manufacturers/models subject to change)

Region	3	
State	Delaware	
AQS ID	10-003-2004	
CBSA	Philadelphia-Camden-Wilmington	
Parameter	Category	Detail
Site	Is the AQS site listed above the expected PAMS Core site?	Yes
	What is the status of the decision for the expected PAMS Core site location (not started, draft, or final)?	Final
	Is there an alternate PAMS Core site location selected?	No
	Identify type of alternative site (existing PAMS, NATTS, etc.)	-
	Alternate site AQS ID (if known)	-
Mixing Height	Is there an existing functional ceilometer or other similar instrument available for use?	Yes
	Current location (at future PAMS Core site, at other site, not applicable)	PAMS site
	Instrument type (ceilometer, radar profiler, etc.)	Ceilometer
	Manufacturer	Vaisala
	Model	CL-51
	Date purchased	2020
	Comments	Installed and reporting
Auto GC	Is there an existing Auto GC available for use?	Yes
	Current location (at future PAMS Core site, at other site, not applicable)	PAMS site
	Manufacturer	CAS
	Model	Chromatotec (FID)
	Date purchased	2017
	Does it have a service contract?	Yes
Comments	Installed; Delaware will operate during PAMS season only	
True NO₂	Is there an existing true NO ₂ instrument available for use?	Yes
	Current location (at future PAMS Core site, at other site, not applicable)	Repaired, awaiting deployment
	Instrument type (photolytic conversion, cavity ringdown, CAPS, etc.)	CAPS
	Manufacturer	Teledyne API
	Model	N500
	Date purchased	2019
	Comments	Removed from service for repairs
Carbonyls Sampling	Is there an existing sequential carbonyls sampling unit or similar instrument available for use?	Yes
	Current location (at future PAMS Core site, at other site,	PAMS site

	not applicable)	
	Instrument type (photolytic conversion, cavity ringdown, CAPS, etc.)	Cartridge Sampler
	Manufacturer	ATEC
	Model	8000
	Date purchased	
	Comments	Installed; collecting for 2024 season
Carbonyls Analysis	Does the site currently have a support laboratory for carbonyls?	Yes
	Laboratory name	Eastern Research Group
	Comments	n/a
Barometric Pressure	Instrument type (aneroid barometer, etc.)	capacitive silicon
	Manufacturer	Vaisala
	Model	WXT 536
	Date purchased	2015
	Comments	Installed
UV Radiation	Instrument type (UV radiometer, etc.)	UV Radiometer
	Manufacturer	Kipp & Zonen
	Model	SUV5-V
	Date purchased	2021
	Comments	Installed
Solar Radiation	Instrument type (pyranometer, etc.)	Pyranometer
	Manufacturer	Kipp & Zonen
	Model	SMP10-V
	Date purchased	2021
	Comments	Installed
Precipitation	Instrument type (tipping bucket, weighing, etc.)	Tipping Rain Gauge
	Manufacturer	RM Young
	Model	52202
	Date purchased	2021
	Comments	Awaiting installation
Humidity	Manufacturer	Vaisala
	Model	WXT 536
	Date purchased	2015
	Comments	Installed
Wind Speed / Wind Direction	Manufacturer	Vaisala
	Model	WXT 536
	Date purchased	2015
	Comments	Installed

Attachment A

Comments and responses to Delaware’s Ambient Air Monitoring Network Plan posted March 31 through April 30, 2024.

Comment 1:

Bruce Wyngaard

Received April 26, 2024

“I live in southern New Castle County in the Whitehall Community which is less than 1 mile from a proposed transportation hub at the Route 301 exit at the corner of Jamison Corner Road. I ask that a monitor be placed near this location for the following reasons:

- Southern New Castle County is Undergoing a Significant Transition.
- Planned Distribution Center Hub Will Substantially Increase Air Pollution and Truck Traffic
- Sensitive Areas Deserve Extra Attention
- Lums Pond Monitoring Location cannot Adequately Service the Needs of Southern New Castle County.
- The Distribution Center HUB has the Making of a New Environmental Justice Threat.

I ask that as you review environment justice monitoring plans that you include the emerging site issues in southern New Castle County.”

See Comments in Attachment B

Delaware DNREC Response 1:

Thank you for your feedback regarding Delaware’s Ambient Air Monitoring Network Plan. The Delaware Department of Natural Resources and Environmental Control is committed to working with community members throughout the state to shape excellent, effective, and engaging two-way communication. The *2024 Ambient Air Monitoring Network Plan for Criteria Pollutants* satisfies the requirements of the Code of Federal Regulations (CFR), Title 40, Chapter 1, Subchapter C, Part 58, Subpart B, §58.10 for states to adopt and submit to the U.S. Environmental Protection Agency (EPA) an annual monitoring network plan which provides for the establishment and maintenance of an air quality monitoring system.

The purpose of this plan is to show the locations of our monitoring stations, explain the monitoring that occurs at the stations and describes proposed updates or changes to the monitoring network. Additionally, the monitoring network is designed primarily to monitor for pollutants with National Ambient Air Quality Standards (NAAQS).

Additional technical information about the monitoring network is available in the [Delaware Ambient Air Monitoring 2020 Network Assessment](#) available on the [Air Monitoring](#) website. As Delaware population has changed and expanded, we continue to evaluate the appropriateness of the network siting. Our network of monitors meets the requirements of the EPA including new criteria to represent underserved and overburdened areas.

Local studies have shown that our existing network of monitors is well placed and representative of New Castle County airshed. While special air monitoring projects are not a topic included in this plan, they are a tool Delaware uses to test the representativeness of the core network and to address community concerns. These projects are resource intensive and dependent upon being fully funded and with appropriate staffing. However, Delaware continues to engage with communities such as yours, seek funding and new tools such as lower cost air sensors, to enhance its capacity to do these special projects.

We thank you for your input and interest in our monitoring program.

Comment 2:

William Robins, M.D.
Received April 29, 2024

“I strongly encourage DENREC to build an air monitoring station in Southern New Castle county for detection of Particulate Matter of 2.5 as soon as possible.”

See Comments in Attachment B

Delaware DNREC Response 2:

Thank you for your feedback regarding Delaware’s Ambient Air Monitoring Network Plan. The Delaware Department of Natural Resources and Environmental Control is committed to working with community members throughout the state to shape excellent, effective, and engaging two-way communication. The *2022 Ambient Air Monitoring Network Plan for Criteria Pollutants* satisfies the requirements of the Code of Federal Regulations (CFR), Title 40, Chapter 1, Subchapter C, Part 58, Subpart B, §58.10 for states to adopt and submit to the U.S. Environmental Protection Agency (EPA) an annual monitoring network plan which provides for the establishment and maintenance of an air quality monitoring system. The purpose of this plan is to show the locations of our monitoring stations, explain the monitoring that occurs at the stations and describes proposed updates or changes to the monitoring network. Additionally, the monitoring network is designed primarily to monitor for pollutants with National Ambient Air Quality Standards (NAAQS).

Additional technical information about the monitoring network is available in the [Delaware Ambient Air Monitoring 2020 Network Assessment](#) available on the [Air Monitoring](#) website.

While special air monitoring projects are not a topic included in this plan, they are a tool Delaware uses to test the representativeness of the core network and to address community concerns. These projects are resource intensive and dependent upon being fully funded and with appropriate staffing. However, Delaware continues to engage with communities, seek funding and new tools such as lower cost air sensors, to enhance its capacity to do these special projects.

EPA’s Region 3 office, headquartered in Philadelphia, Pennsylvania, has portable air quality sensors available for loan to the public. This program is designed to assist community groups

such as yours with conducting their own small-scale localized air monitoring projects. The purpose of this program is to increase accessibility to affordable and user-friendly air quality sensor equipment to inform communities about local air quality and to screen for possible impacts. These sensors are not Federal Equivalent Methods (FEMs) or Federal Reference Methods (FRMs), and the data from these sensors are not applicable to regulatory decision making for the National Ambient Air Quality Standards (NAAQS). Information for this program is available on EPA Region 3's [website](#).

We thank you for your input and interest in our monitoring program.

Attachment B

From: Leslie A. Brower <browynfam@aol.com>
Sent: Friday, April 26, 2024 2:37 PM
To: DNREC_DAO_Monitoring <DNREC_DAO_Monitoring@delaware.gov>
Cc: browynfam@aol.com; William Robins <billrobins52@yahoo.com>; Sharon Steele <srsteele77@gmail.com>; Neal Cantrell <nealdcantrell1@gmail.com>
Subject: DNREC Air Quality Monitoring Plan - Notice. AQ20240099

Thank you for the opportunity to comment on Delaware's air monitoring network plan.

I live in southern New Castle County in the Whitehall Community which is less than 1 mile from a proposed transportation hub at the Route 301 exit at the corner of Jamison Corner Road. I ask that a monitor be placed near this location for the following reasons:

Southern New Castle County is Undergoing a Significant Transition.

According to the New Castle County Strategic Plan (NCCSP) the southern New Castle County is quickly moving from a rural community to a suburban community that will result in more commuter and transit traffic and higher density of residential communities. According to the NCCSP between 1954-1970 98% of new single family homes were built north of the Chesapeake and Delaware Canal. Between 2002 and 2018 development shifted to 46% of all single family homes. Southern NCC had only 4% of the county wide population in 1990 and by 2016 it was 10% of the county wide population. These statistics are 6 and 8 years old respectively and now, given significant growth, these are underestimates.

Recognizing this population shift, WILMAPCO is updating plans to address the increased need for public transit. (See WILMAPCO web site on public hearings and Open Houses). Related commuter traffic is increasing as well. The opening of Route 301 in 2019 is accelerating the transition of southern New Castle County.

Planned Distribution Center Hub Will Substantially Increase Air Pollution and Truck Traffic

At the corner of Route 301 and Jamison Corner Rd there are three proposed Distribution Centers totaling 3.7 million square feet. The approved Scott Run Center will be 862,00 square feet. The proposed Logisticenter is 2.4 million square feet and is expected to generate 3750 trucks and car trips per day. It is waiting for approval. The proposed Jamison Commerce Center is 471,000 square feet, and will generate 750 truck trips per day. Not counting the Scott Run Center, for which traffic projections are not available, current estimates for the other two operations suggest over 4500 additional truck and car trips per day.

Distribution Centers as sources of pollution are very well documented. (*Making the Invisible Visible*, Environmental Defense Fund, April 2023.) Communities that are located less than 2 miles from such sources of pollution will be impacted. Updated

science shows that increased PM 2.5 and other pollutants will have a detrimental impact on persons of all ages. In February 2024 the EPA substantially decreased its PM 2.5 standard from 12 to 9 parts per billion, recognizing that such pollutants have a serious impact on human health.

New Communities are being built and planned that are adjacent to the proposed Distribution Hub. All of them are 2 kilometers or less from these sources of pollution. These include the established community of Airmont, new communities that are under construction such as Brighton, Whitehall, Traditions (55+), and Bayberry North and South. There are four additional communities that will be less 2 kilometers away that are approved or awaiting approval. Major road expansion is proposed for connecting roads to the Distribution Centers, bringing even more traffic and air pollution.

Sensitive Areas Deserve Extra Attention

It is also documented that PM 2.5 and other pollutants affect younger persons more, as their bodies consume more air for their body weight, they spend more time outdoors and their immune systems are still maturing. We have two high schools, three elementary schools and two daycare centers within 2.1 kilometers from the Distribution Centers. A monitor will help us understand the environmental conditions where they play and go to school.

Lums Pond Monitoring Location cannot Adequately Service the Needs of Southern New Castle County.

The Lums Pond monitoring site cannot adequately address the new sources of pollution south of the Chesapeake and Delaware Canal because It is too far away to capture air pollution. However, this site will be helpful as traffic will increase on Route 896/71. However, the growth and concentration of pollution caused by Route 301 and also the Distribution Center Hub necessitates an additional monitor. In addition, population density will substantially increase as a result of the planned construction of at least 9 additional residential communities, bringing more human exposure to diesel pollution.

The Distribution Center HUB has the Making of a New Environmental Justice Threat.

I realize that the issue of environmental justice typically involves established, low income and minority communities that are located near industrial source pollution. It is well documented that persons living there suffer the serious consequences of breathing the air where they live.

New Castle County's land use decisions have not factored in the impacts of neighborhoods being co-located near these industrial sources of pollution. This amounts to engineering an environmental justice threat where we live. Given what we know about the science of diesel air pollution, it defies logic that the Distribution Centers are on properly zoned parcels, immediately adjacent to the existing and planned

residential communities. All the communities are well within the zones of pollution caused by the distribution centers. This is a permissible land use outcome.

In recognition of the new science regarding the impacts of proximity of pollution sources located near by residential and sensitive properties, the EPA has recently asked the states to make changes to the monitoring practices to address environmental justice concerns. The environmental justice concerns in Wilmington are well known and deserve significant focus. We have similar concerns as land use decisions have not adjusted to the new science.

I ask that as you review environment justice monitoring plans that you include the emerging site issues in southern New Castle County.

Thank you for this opportunity to comment. I hope you will consider the new science and growth in southern New Castle County and locate a monitor where many more people are live, work and play.

Bruce Wyngaard
550 Wheelmen St.
Middletown DE. 19709

From: William Robins <billrobins52@yahoo.com>
Sent: Monday, April 29, 2024 12:55 PM
To: DNREC_DAO_Monitoring <DNREC_DAO_Monitoring@delaware.gov>
Subject: Air monitoring

DENREC

I strongly encourage DENREC to build an air monitoring station in Southern New Castle county for detection of Particulate Matter of 2.5 as soon as possible.

Lums Pond state monitoring station is the second oldest monitoring station in Delaware and can not provide quality air monitoring because of years of expansion in neighboring home developments in formerly rural areas of New Castle County—neighborhoods such as Whitehall, Traditions at Whitehall, Bayberry, and Brighton.

Better air quality monitoring is more urgently needed at this time because of plans to build industrial size Distribution Warehouse Centers along Route 301 extension. These warehouse centers are being placed in the middle of the above mentioned neighborhoods.

These Distribution Centers bring thousands of diesel trucks into our neighborhoods spewing out truck emissions with 20 - 25 toxic chemicals and particulate matter 2.5 microns and smaller into the air.

The Particulate Matter of 2.5 and 1.0 microns can linger in the neighborhood air for days and weeks, spreading out from the warehouses for several miles. Children will be outside playing, Mom and Dad walking outside living their lives breathing in these nano-particles. Medical research of the past ten years shows that inhaling Particulate Matter 2.5 and smaller cause increased incident of asthma, lung cancer, acute heart attacks, congestive heart failure and dementia.

Russell Zerbo of Clean Air org has been very helpful with advice. His talking points are spot on, showing the concerns of the families in Southern New Castle about air pollution brought into our neighborhoods.

The Clean Air org with Russel Zero has supplied Particulate Matter monitoring devices that are put into a network of homes in affected neighborhoods. This will be more data points as baseline of Particulate matter in local air of air before pushing forward huge track warehouses centers that we know will add a significant levels of PMs harming nearby families' health.

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