

Mr. Purefoy,

The following information will hopefully be useful to you and concerned citizens contacting your office:

The TCEQ appreciates your inquiry and concerns regarding air quality in your neighborhood and near area schools, and assures you that we are actively working to address air quality problems in Frisco and throughout the state.

We understand that a report by USA Today as well as the recent recommendation for a portion of the area to be classified as not attaining the federal lead standard has raised serious concerns regarding air quality at area schools. TCEQ staff evaluated the information presented in the USA Today report and on their website and has identified some significant discrepancies between USA Today's results and our staff conclusions based on actual air quality monitoring data.

The rankings of schools by USA Today are based on theoretical modeling results of emissions data, not on a health effects evaluation of actual measured ambient air concentrations from air monitors. The purpose of modeling is to predict air quality conditions in cases where actual monitoring data is not available. Because Texas has an extensive air monitoring network, we do not rely solely on modeling results. TCEQ staff conducted a health effects evaluation of monitoring data (from monitors located at or in close proximity to eight schools in the state) for the major risk contributors identified by USA Today. The eight schools were ranked by USA Today from the 48th to the 1st percentile of schools with the potentially poorest air quality. Our evaluation of monitoring data identified no unsafe exposure levels at any of the eight schools. Of particular note is staff analysis of Cesar Chavez High School in Houston, ranked in the 1st percentile of schools with poor air quality by USA Today, with 90% of toxicity attributed to 1,3-butadiene: evaluation of over 30,000 air measurements collected from 2004-2008 from a monitor located 0.2 miles from the school indicated 1,3-butadiene at safe levels.

Though the TCEQ does not currently operate a monitor at any of the USA Today-identified schools in Frisco, our analysis of other schools in Texas leads us to view the USA Today data cautiously for the Frisco area.

The TCEQ has been monitoring lead concentrations at various locations in ambient air in Frisco since 1981, and is currently operating three Frisco monitors. One site (Frisco 7), located north of the Exide facility in a neighborhood off of Ash Street (*Figure 1*), has been operating continuously since 1994. The other two monitors have historically been on Exide property, but have recently been moved to non-Exide property (Frisco 9, just north of Exide on Eubanks, and, Frisco 5, just east of Exide) to provide data more representative of off-property concentrations. A fourth monitoring site will be established sometime this fall, near the Frisco Police Department, south of Exide.

The neighborhood monitor has consistently recorded concentrations well below the 1978 lead National Ambient Air Quality Standard (NAAQS) of 1.5 $\mu\text{g}/\text{m}^3$ (*Figure 2*). The EPA lowered the lead NAAQS tenfold to 0.15 $\mu\text{g}/\text{m}^3$ in November 2008, to provide increased protection for sensitive subpopulations (young children). The neighborhood monitor has recorded exceedances of the 2008 NAAQS. Accordingly, the EPA has

proposed a nonattainment designation for the 2008 lead NAAQS for an area in Frisco surrounding the Exide facility (the same boundary recommended by the TCEQ). Frisco High School is located within this proposed nonattainment area.

The recommendation for nonattainment designation was triggered by monitored exceedances of the NAAQS in ambient air and the EPA default nonattainment designation boundary is the county. Rather than recommend the entire county of Frisco as the nonattainment area boundary, the TCEQ used computer dispersion modeling to predict air lead levels based on maximum permitted emissions rates (the highest emission rates authorized by existing permits). The TCEQ does not have a monitor at Frisco High School; however, modeling predicts the lead concentrations at Frisco High School to be approximately three times lower than the concentration at the neighborhood monitor. The predicted lead concentration at Frisco High School based on this ratio rather than the modeled maximum allowable emissions is approximately 0.066 $\mu\text{g}/\text{m}^3$, well below the 2008 lead NAAQS. Because the NAAQS is set to be protective of human health, no adverse health effects are expected at areas with ambient air concentrations below the level of the NAAQS.

Because the EPA has proposed a nonattainment designation for the 2008 lead NAAQS for the area around the Exide facility in Frisco, the TCEQ will submit to the EPA an attainment demonstration state implementation plan (SIP) revision by June 2012 that will require control measures and continued monitoring to ensure expeditious attainment of the NAAQS in the affected area. The process of developing and adopting an attainment demonstration SIP will involve a public comment period and a public hearing.

In conclusion, because the USA Today report shows significant discrepancies from existing monitoring data at Texas schools, the TCEQ has considerable concern regarding the accuracy of the results for the four Frisco-area schools. The TCEQ knows of no schools in Texas where ambient concentrations of air toxics are unsafe. The TCEQ is committed to ensuring that the air in Texas is safe for all Texans to breathe, including potentially sensitive groups such as school children.

We would be glad to provide additional information on why we disagree with the USA Today analysis as well as the lead nonattainment designation or corrective action process. Please feel free to contact us with any additional questions or concerns you may have.

Sincerely,
Matthew R. Baker, P.E., Asst. Director
Field Operations Support Division
TCEQ

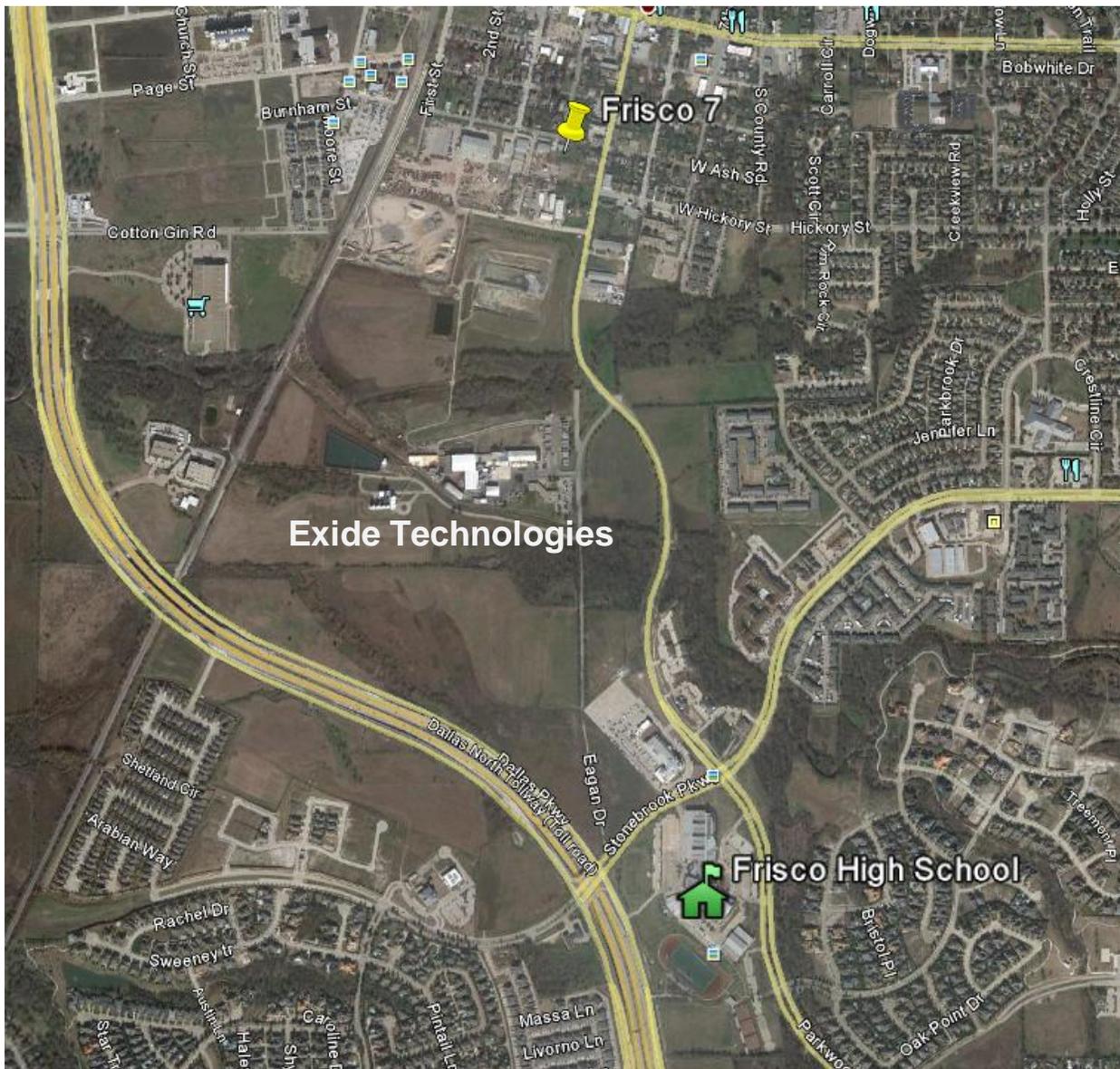


Figure 1. Aerial image of relative location of Ash Street (Frisco 7) monitor, Exide and Frisco High School

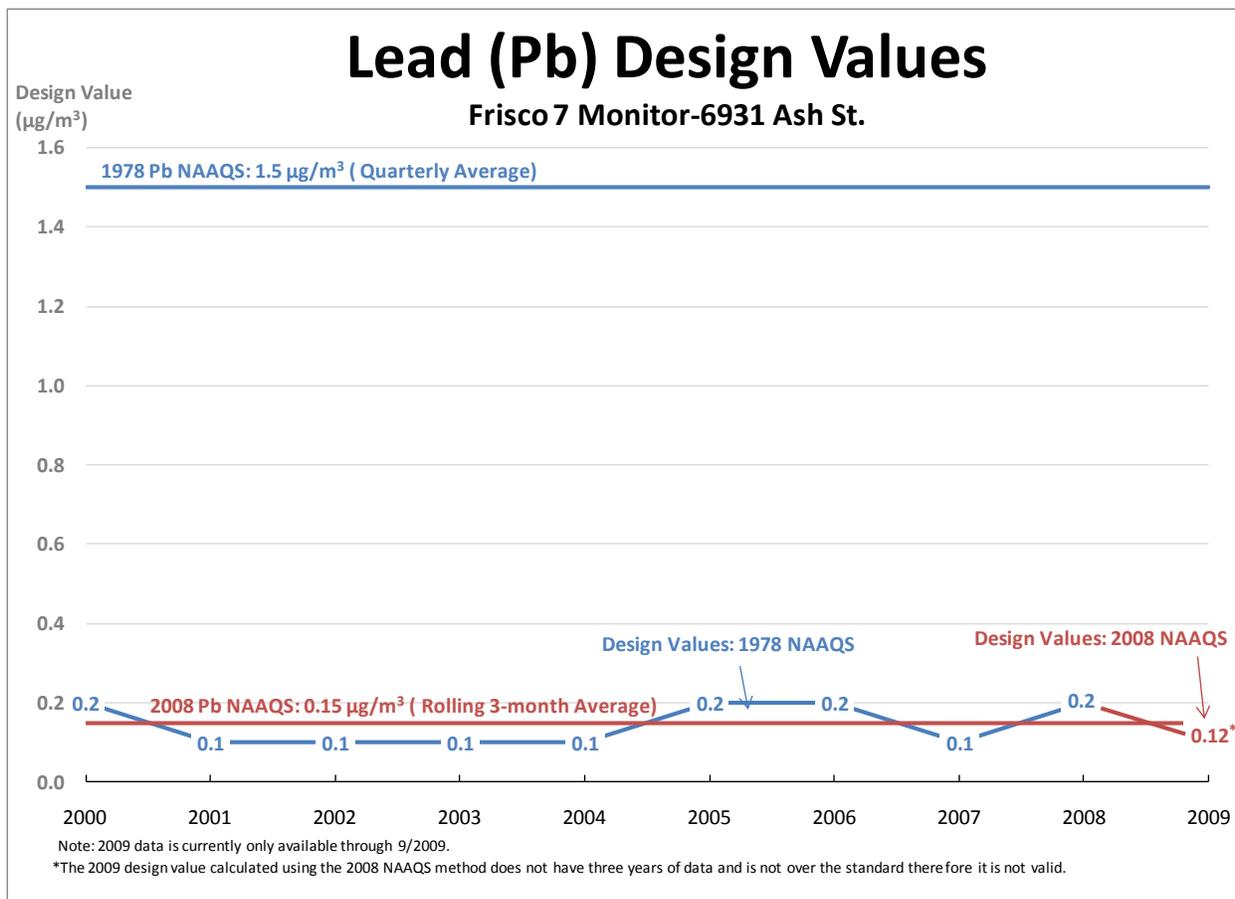


Figure 2. Lead Design Values Calculated from Ash Street (Frisco 7) Monitor 2000 to 2009

The 2009 design value calculated using the 2008 NAAQS method does not have three years of data and is not over the standard therefore it is not valid

Note: 2009 data is currently only available through September 2009