Nashville-Davidson County Air Monitoring Network Plan 2024

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I. TABLE OF CONTENTS

I.	TAE	LE OF CONTENTS	2
II.	LIST	OF TABLES	3
III.	LIST	OF FIGURES	3
1.0	NAS	SHVILLE AIR MONITORING NETWORK OVERVIEW	3
	1.1	CURRENT 2024 MONITORING NETWORK	4
2.0	PRC	POSED CHANGES TO MONITORING NETWORK	5
		1.3.1 Ozone Monitoring	5
	2.2	PM ₁₀ MONITORING	6
	2.3	PM _{2.5} MONITORING	6
	2.4	NITROGEN DIOXIDE MONITORING	6
	2.5	CARBON MONOXIDE MONITORING	6
	2.6	SULFUR DIOXIDE MONITORING	6
3.0	SITE	E DESCRIPTIONSERROR! BOOKMARK NOT DEFINE	ΞD.
	3.1	("EAST") EAST HEALTH CENTER – DAVIDSON COUNTY, TN	6
	3.2	("PPD") PERCY PRIEST DAM – DAVIDSON COUNTY, TN	8
	3.3	("LL") LOCKELAND ELEMENTARY SCHOOL – DAVIDSON COUNTY, TN	.10
	3.4	("NRS") NEAR ROAD SITE - DAVIDSON COUNTY, TN	.12
4.0	CUF	RRENT SITE ASSESSMENTS	.14
	4.1	("EAST") EAST HEALTH CENTER SITE ASSESSMENT	.15
	4.2	("PPD") PERCY PRIEST DAM SITE ASSESSMENT	.17
	4.3	LOCKELAND ELEMENTARY ("LL") 2024 SITE ASSESSMENT	.19
	4.4	NEAR ROAD ("NRS") 2024 SITE ASSESSMENT	.21
App	endi	x A: Site Evaluation Form [PCD-AM-020]	.23

II. <u>LIST OF TABLES</u>

Table 3-1: East Health Center Site Information	7
Table 3-2: Percy Priest Dam Site Information	9
Table 3-3: Lockeland Site Information	
Table 3-4: Near Road Site Information	
Table 4-1: Current Site Assessment Results Summary	14
III. <u>LIST OF FIGURES</u>	
Figure 1-1: Nashville-Davidson County Air Monitoring Network	4
Figure 3-1: East Health Center	6
Figure 3-2: East Health Center (Aerial View)	6
Figure 3-3: Percy Priest Dam Site	8
Figure 3-4: Percy Priest Dam Site (Aerial View)	8
Figure 3-5: Lockeland Aerial View	10
Figure 3-6: Lockeland Site	10
Figure 3-7: Near Road Site	12
Figure 3-8: Near Road Site (Aerial View)	12
Figure 4-1: "EAST" NORTH-Facing VIEW	15
Figure 4-2: "EAST" East-Facing View	15
Figure 4-3: "EAST" West-Facing View	15
Figure 4-4: "EAST" South-Facing View	15
Figure 4-5: "EAST" 2024 Site Assessment Form	16
Figure 4-6: "PPD" North-Facing View	17
Figure 4-7: "PPD" West-Facing View	17
Figure 4-8: "PPD" South-Facing View	17
Figure 4-9: "PPD" East-Facing View	17
Figure 4-10: "PPD" 2024 Site Assessment Form	18
Figure 4-11: "LL" NORTH-Facing VIEW	19
Figure 4-12: "LL" EAST-FACING VIEW	19
Figure 4-13: "LL" SOUTH-FACING VIEW	
Figure 4-14: "LL" WEST-FACING VIEW	19
Figure 4-15: "LL" 2024 Site Assessment Form	
Figure 4-16: "NRS" North-Facing View	21
Figure 4-17: "NRS" EAST-FACING VIEW	
Figure 4-18: "NRS" West-Facing View	
Figure 4-19: "NRS" South-Facing View	21
Figure 4-20: "NRS" 2024 Site Assessment Form	22

1.0 NASHVILLE AIR MONITORING NETWORK OVERVIEW

After the Clean Air Act (CAA) of 1970 was passed, the State of Tennessee's Department of Environment and Conservation Air Monitoring Program ("TDEC") was established in the mid-1970s. Shortly thereafter, the Nashville-Davidson County Air Monitoring Program ("Nashville") was established and worked in partnership with TDEC as a single Primary Quality Assurance Organization (PQAO). Beginning January 1st, 2015, Nashville became its own (PQAO) and has continually operated as such since. With that said, Nashville still works closely with TDEC as the requirements for the Nashville-Davidson-Murfreesboro-Franklin Core-Based Statistical Area (CBSA) are met by monitors operated within both the Nashville and TDEC's air monitoring networks.

This document provides information on Nashville's current 2024 Ambient Air Monitoring Network. With that, it details any proposed changes to the network, monitoring site descriptions, and monitoring site evaluations. This document is intended to fulfill the requirements of 40 CFR Part 58.10, in which a monitoring organization must review their network on an annual basis to ensure that all requirements (within 40 CFR, Part 58, Appendices A, B, C, D, and E) are being met.

1.1 CURRENT 2024 MONITORING NETWORK

The 2024 Nashville-Davidson County Ambient Air Monitoring Network has had no significant changes made compared to 2023. The map shown in *Figure 1-1* below depicts the location of each ambient air monitoring site within Nashville's 2024 monitoring network.

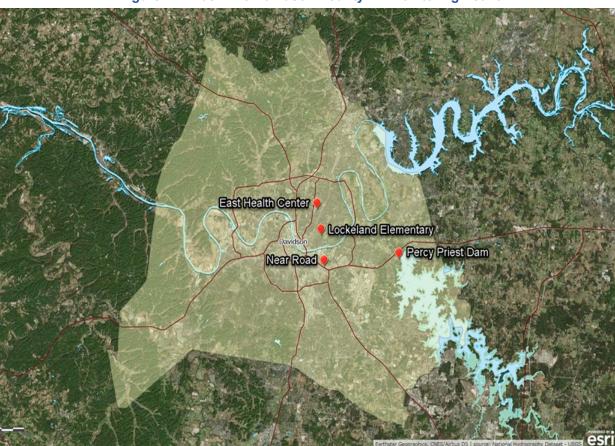


Figure 1-1: Nashville-Davidson County Air Monitoring Network

Nashville has four (4) monitoring sites in operation for 2024. These sites are listed below along with the criteria pollutants monitored at each site.

- 1) The <u>East Health Center ("East")</u> site monitors for ozone (O₃) and nitrogen dioxide (NO₂) (along with its supporting parameters Nitrous Oxide (NO) and Nitrogen Oxides (NO_X));
- 2) The <u>Lockeland Elementary School ("LL")</u> site monitors for continuous PM₁₀, continuous PM_{2.5} (*Regulatory and AQI specific*), and intermittent filter-based PM_{2.5}:
- 3) The PERCY PRIEST DAM ("PPD") site monitors for O₃; and
- 4) The NEAR ROAD SITE ("NRS") monitors for PM_{2.5}, carbon monoxide (CO), NO₂ (along with NO/NO_x), and sulfur dioxide (SO₂) (along with its supporting parameter SO_2MAX).

Nashville's 2024 air monitoring network meets all minimum monitoring requirements laid out in *40CFR* for all parameter pollutants (PM_{2.5}, O₃, SO₂, NO₂, and CO) except PM₁₀, which is discussed in further detail below.

In response to its 2016 Annual Network Plan, Nashville gained EPA approval for waiver of a *40CFR* requirement (*Part 58, Appendix D, Section 4.6*), which outlines the need for two (2) PM₁₀ monitors to be operated within the Nashville-Davidson-Murfreesboro-Franklin CBSA. This waiver allows Nashville to have only one (1) PM₁₀ monitor in operation within its monitoring network and was approved due to the historically low PM₁₀ concentrations recorded in Davidson County. This waiver was reviewed during Nashville's 2020 Five-Year Network Assessment.

Additionally, from the start of its operation on September 1st, 2020, until August 30th, 2022 (*a 2-year period*), the Teledyne T640x PM_{2.5} continuous FEM monitor, located at the "LL" site, was operating under an EPA approved 2-year NAAQS exclusion. This exclusion was granted while an investigation into the monitor's comparability to the FRM occurred. The investigation resulted in the conclusion that the T640x PM_{2.5} Continuous FEM monitor had poor comparability to the FRM. In response to its 2023 Annual Network Plan, the AMP received EPA approval for continuing the NAAQS exclusion for the T640x PM_{2.5}. Granted, the T640x PM_{2.5} monitor data has been deemed to have sufficient comparability to the FRM to be used in AQI reporting. Thus, all data (*from the start of operation continuing on*) reported for Nashville's T640x PM_{2.5} Continuous FEM monitor at "LL" will be used solely for AQI reporting purposes and is excluded from NAAQS comparison.

Nashville has continued to operate its collocated PM_{2.5} FRM and PM_{2.5} continuous FEM monitors to support the objective of comparison to the NAAQS, consequently all of Nashville's PM_{2.5} monitors have been operated in such a way to meet the objectives of *the Network Design Criteria for Ambient Air Quality Monitoring* described in *Appendix D* to *Part 58*.

2.0 PROPOSED CHANGES TO MONITORING NETWORK

No major changes are proposed to take place in 2024 for the Nashville-Davidson County Monitoring Network.

1.3.1 OZONE MONITORING

No changes are proposed for this portion of the Nashville Davidson County Air Monitoring Network in 2024. Although, discussions have taken place with the EPA with regards to moving the ozone monitor, currently located at the "PPD" monitoring site, to a new location for future monitoring. This new site has not yet been confirmed but likely will be in the Southeast quadrant of Davidson County, located to ensure the capture of pollutants downwind of the secondary wind direction. Some things must be kept in mind during this location scouting such as ideally positioning the new site 5-10 miles downwind from NO_x production areas (downtown highway loop). The new location should be relevant to current population dynamics and ensure that afternoon wind directions during O_3 season are considered.

2.2 PM₁₀ MONITORING

No changes are proposed for this portion of the Nashville Davidson County Air Monitoring Network.

2.3 PM_{2.5} MONITORING

No changes are proposed for this portion of the Nashville Davidson County Air Monitoring Network.

2.4 NITROGEN DIOXIDE MONITORING

No changes are proposed for this portion of the Nashville Davidson County Air Monitoring Network.

2.5 CARBON MONOXIDE MONITORING

No changes are proposed for this portion of the Nashville Davidson County Air Monitoring Network.

2.6 SULFUR DIOXIDE MONITORING

No changes are proposed for this portion of the Nashville Davidson County Air Monitoring Network.

3.0 NASHVILLE SITE DESCRIPTIONS

3.1 ("EAST") EAST HEALTH CENTER - DAVIDSON COUNTY, TN

The East Health Center Monitoring Site has been in operation since 1972. Since its start, this site has been used to monitor for O_3 and NO_2 (and NO/NO_X) and will continue to do so in 2024.

Additionally, although Nashville had its SO₂ monitor at this site, starting January 2020, SO₂ monitoring was moved to the "NRS" site location, where is has remained since.

Figure 3-1: East Health Center



Figure 3-2: East Health Center (Aerial View)



Table 3-1: East Health Center Site Information

Agency Name (Code)	Metro Public Health Department (0682)					
AQS ID	470370011					
County Name	David	dson				
Address	1015 Trir	ity Lane				
CBSA	349	80				
Latitude, Longitude	36.205000,	-86.744722				
Parameter Code	42602	44201				
Parameter Name	NO ₂	O ₃				
Monitor Type	SLAMS	SLAMS				
POC	1	1				
Collection Frequency	Hourly	Hourly				
Method	74	47				
Monitoring Instrument	Thermo 42i	Thermo 49i				
Analysis	Chemiluminescence	Photometric				
Ref. Method ID	RFNA-1289-074	EQOA-0880-047				
Monitor Objective	Highest Concentration	Population Exposure				
Dominant Source	Area	Area				
Measurement Scale	Neighborhood	Neighborhood				
Land Use Type	Residential	Residential				
Location Setting	Urban	Urban				
Date Established	1/6/1975	1/1/1972				

3.2 ("PPD") PERCY PRIEST DAM – DAVIDSON COUNTY, TN

The Percy Priest Dam monitoring site was established in 1978. It is located on the Army Corps of Engineers Percy Priest Dam campus. This site is used to monitor solely for O_3 .



Figure 3-3: Percy Priest Dam Site



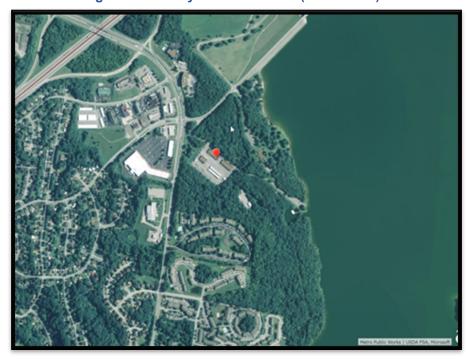


Table 3-2: Percy Priest Dam Site Information

Agency Name (Code)	Metro Public Health Department (0682)
AQS ID	470370026
County Name	Davidson
Address	3711 Bell Road
CBSA	34980
Latitude, Longitude	36.150742, -86.623301
Parameter Code	44201
Parameter Name	O ₃
Monitor Type	SLAMS
POC	1
Collection Frequency	Hourly
Method	47
Monitoring Instrument	Thermo 49i
Analysis	Photometric
Ref. Method ID	EQOA-0880-047
Monitor Objective	Highest Concentration
Dominant Source	Area
Measurement Scale	Urban
Land Use Type	Agricultural
Location Setting	Urban
Date Established	28491

3.3 ("LL") LOCKELAND ELEMENTARY SCHOOL - DAVIDSON COUNTY, TN

The "LL" monitoring site began operation in 1999 and monitors for PM_{2.5} and PM₁₀. This will continue in 2024.

At the end of 2014, this site was defunded as a CSN site and the SASS and URG monitors were shut down. At the end of 2016, the Hi-Vol PM₁₀ monitors at Trevecca and McCann were approved to be shut down and in January 2017 a PM₁₀ TEOM monitor began operation at this location. Starting July 1st, 2019, an FEM (POC 3) MetOne BAM 1022 PM_{2.5} monitor was added to the "LL" site to replace the Thermo 2025i FRM (POC 1) monitor. This decision to replace the FRM with an FEM was justified in the 2019 Annual Network Plan and approved by EPA.

In the beginning on 2020, a Tornado caused damage to the "LL" site and the equipment stationed there, causing this site to be shut down for repair. All equipment had to be replaced and monitoring began again in August/September 2020. As a result of this incident, several changes were made to the type of PM monitors that were previously at the site. The two (2) Thermo TEOM 1405 monitors (*which captured data for PM*_{2.5} (*AQI*) and *PM*₁₀) were replaced with a single piece of equipment, the Teledyne T640x which measures for both criteria pollutants (PM_{2.5} & PM₁₀). As discussed previously, the T640x PM2.5 monitor at "LL" is used solely for AQI reporting.

In September 2023, Nashville's T640x monitors underwent a software configuration, released by Teledyne, to help more closely align the T640x with the FRM. After this update, the PM_{2.5} and PM₁₀ method codes changed (*from 238 and 239 to 638 and 639, respectively*), and although the T640x PM_{2.5} has a NAAQs exclusion and is considered a Special Purpose Monitor (SPM), it will be reported with the 88101 Parameter Code instead of 88502, as the 88502 code does not yet work in AQS with the new 638 method code.

Figure 3-6: Lockeland Site



Figure 3-5: Lockeland Aerial View



Table 3-3: Lockeland Site Information

Agency Name (Code)	Metro Public Health Department (0682)										
AQS ID	470370023										
County Name		David	Ison								
Address		105 South 1	7th Street								
CBSA		349	80								
Latitude, Longitude		36.176326, -	86.738902								
Parameter Code	88101	88101	88101	81102							
Parameter Name	PM _{2.5}	PM _{2.5}	PM _{2.5}	PM ₁₀							
Monitor Type	SLAMS	SLAMS									
POC	2	3	4	2							
Collection Frequency	1:6	Hourly	Hourly	Hourly							
Method	145	209	638	639							
Monitoring Instrument	Thermo 2025i	Teledyne T640x	Teledyne T640x								
Analysis	Gravimetric	Beta Attenuation	Light Scattering	Light Scattering							
Ref. Method ID	EQPM-0202-145	EQPM-1013-209	EQPM-0516-638	EQPM-0516-639							
Monitor Objective	Population Exposure	Population Exposure	Population Exposure	Population Exposure							
Dominant Source	Area	Area	Area	Area							
Measurement Scale	Neighborhood	Neighborhood	Neighborhood	Neighborhood							
Land Use Type	Residential	Residential	Residential	Residential							
Location Setting	Urban	Urban	Urban	Urban							
Date Established	1/1/1999	1/1/1999	3/1/2001	1/1/2017							

3.4 ("NRS") NEAR ROAD SITE - DAVIDSON COUNTY, TN

As a result of the 40CFR near road NO₂ monitoring requirement, Nashville's Near Road monitoring site was established in July 2014, along the I-24/I-40 split in downtown Nashville. CO, NO₂, and PM_{2.5} monitors have been in operation at this site since its start.

Although initially using a PM_{2.5} FRM monitor (Thermo 2025i) at this site, in July 2019, Nashville replaced it with an FEM PM_{2.5} monitor (MetOne BAM1022). In January 2020, SO₂ monitoring began at this site after being moved from the "EAST" site. Nashville will continue to monitor for PM_{2.5}, CO, SO₂ (& SO_{2MAX}), and NO₂ (& NO/NO_{X}) at "NRS" in 2024.







Table 3-4: Near Road Site Information

Agency Name	Metro Public Health Department (0682)								
AQS ID	470370040								
County Name	Davidson								
Address	1113 Elm Hill Pike								
CBSA		3498	30						
Latitude, Longitude		36.142377, -	86.734142						
Parameter Code	42101	42602	42401	88101					
Parameter Name	СО	NO ₂	SO ₂	PM _{2.5}					
Monitor Type	SLAMS	SLAMS	SLAMS	SLAMS					
POC	1	1	1	3					
Collection Frequency	Hourly	Hourly	Hourly	Hourly					
Method	54	74	60	209					
Monitoring Instrument	Thermo 48i	Thermo 42i-TL	Thermo 43i	MetOne BAM 1022					
Analysis	Infrared	Chemiluminescence	Pulsed Fluorescence	Beta Attenuation					
Ref. Method ID	RFCA-0981-054	RFCA-1289-574	EQSA-0486-060	EQPM-1013-209					
Monitor Objective	Population Exposure	Population Exposure	Population Exposure	Population Exposure					
Dominant Source	Area	Area Area		Area					
Measurement Scale	Urban	Urban	Urban	Urban					
Land Use Type	Industrial	Industrial	Residential	Industrial					
Location Setting	Urban	Urban	Urban						
Date Established	7/1/2014								

4.0 **CURRENT SITE ASSESSMENTS**

Each year, siting evaluations are performed to assess the impact of obstructions, such as trees and buildings, on the sampling inlets at Nashville's monitoring sites. These assessments should be measured while the leaf canopy is full to assess the potential issues fully.

Each of Nashville's monitoring sites have been assessed in the last calendar year, and meet requirements laid out in 40 CFR Part 58, Appendix E. The results of these site assessments can be found below in: Table 3-1 "2024 Site Assessment Results Summary", the filled-out Site Evaluation Forms [PCD-AM-020] for each site, as well as pictures showing 360° around the site monitor inlet. Additionally, included in Appendix A of this document, is the Site Evaluation Form [PCD-AM-020] that Nashville's Field Technicians will use to conduct these site evaluations.

Table 4-1: 2024 Site Assessment Results Summary

Table 4-1: 2024 Site Assessment Results Summary									
East Health	Center				Assessment L	Date: 4/22/24			
Site Pollutant	Probe Inlet Height (IH)	Obstruct. Height (OH)	Dripline	Obstruct. Distance (OD)	Obstruct. Type	Unrestricted Airflow	Findings		
O ₃	10.0 m	16.3 m	17.0 m	19.3 m	Trees	300°	Site OK; trees to the north and east will		
NO ₂	10.0 m	16.3 m	17.0 m	19.3 m	Trees	300°	be monitored.		
Percy Priest	Dam				Assessment L	Date: 4/18/24			
Site Pollutant	Probe Inlet Height (IH)	Obstruct. Height (OH)	Dripline	Obstruct. Distance (OD)	Obstruct. Type	Unrestricted Airflow	Findings		
O ₃	5.3 m	18.0 m	38.0 m	45.0 m	Trees	310°	Site OK; trees to the north will be monitored.		
Lockeland E	lementary				Assessment L	Date: 4/18/24			
Site Pollutant	Probe Inlet Height (IH)	Obstruct. Height (OH)	Dripline	Obstruct. Distance (OD)	Obstruct. Type	Unrestricted Airflow	Findings		
PM _{2.5} (Primary FEM - Collocated)	5.8 m	6.1 m	30.0 m	19.0 m	Building	280°	Site OK; all large		
PM _{2.5} (FRM - Collocated)	5.8 m	6.1 m	30.0 m	20.5 m	Building	280°	trees lost at site due to 2020 tornado/2021 storms.		
PM _{2.5} (AQI only) PM ₁₀	5.8 m	6.1 m	30.0 m	18.5 m	Building	280°	Collocated Distance: 3.0 m		
Near Road S	ite				Assessment L	Date: 4/22/24			
Site Pollutant	Probe Inlet Height (IH)	Obstruct. Height (OH)	Dripline	Obstruct. Distance (OD)	Obstruct. Type	Unrestricted Airflow	Findings		
SO ₂	4.5 m	14.4 m	19.9 m	23.0 m	Trees	300°	Site OK; vegetation		
CO	4.5 m	14.4 m	19.9 m	23.0 m	Trees	300°	on fence line and trees to the east will		
NO ₂	4.5 m	14.4 m	19.9 m	23.0 m	Trees	300°	be monitored.		
PM _{2.5}	4.5 m	14.4 m	19.9 m	23.0 m	Trees	300°	Distance to nearest road: 28.9 m		

4.1 ("EAST") EAST HEALTH CENTER SITE ASSESSMENT

Figure 4-1: "EAST" NORTH-Facing VIEW



Figure 4-4: "EAST" East-Facing View



Figure 4-2: "EAST" South-Facing View



Figure 4-3: "EAST" West-Facing View

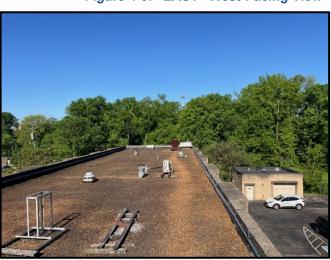
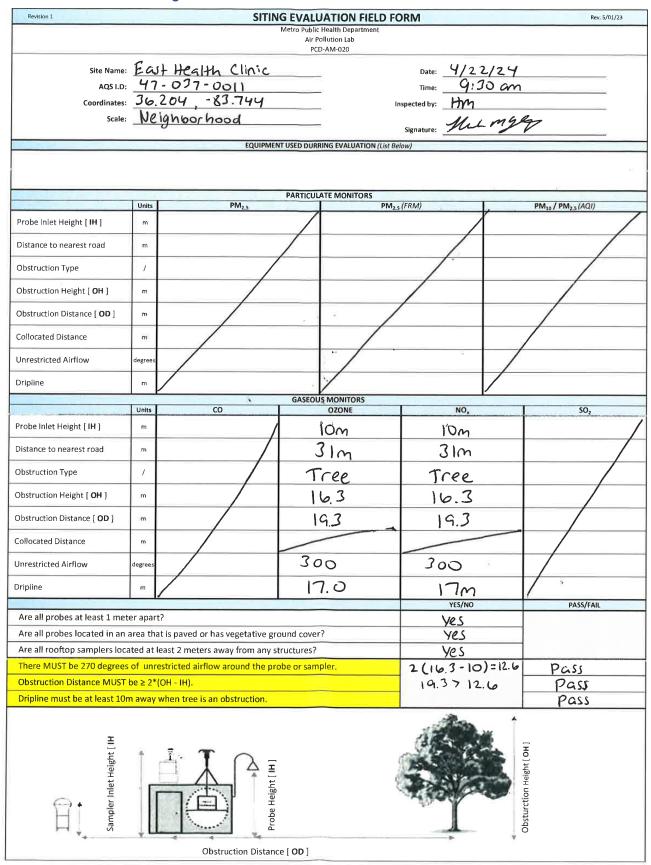


Figure 4-5: "EAST" 2024 Site Assessment Form



4.2 ("PPD") PERCY PRIEST DAM SITE ASSESSMENT

Figure 4-6: "PPD" North-Facing



Figure 4-9: "PPD" East-Facing



Figure 4-7: "PPD" SOUTH-FACING View



Figure 4-8: "PPD" West-Facing View



Figure 4-10: "PPD" 2024 Site Assessment Form

Revision 1		SITIN		JATION FIELD F	ORM			Rev. 5/01/23
Air Pollution Lab PCD-AM-020								
Site Name: AQS I.D: Coordinates:	р, - 4	ercy Priest Dam 7. 037.0026 66.150, -86.63 Urban			Date: Time: nspected by:	i i	/180 B.D.	0
Scale:	,	Urban		-	Signature:	A	20	m
		EQUIPMEN	IT USED DUR	RING EVALUATION (List B	lelow)			
			PARTICUI	ATE MONITORS				
Probe Inlet Height [IH]	Units	PM _{2,5}		PM ₂	_{1.5} (FRM)			PM ₁₀ / PM _{2.5} (AQI)
			-/-			-/		
Distance to nearest road	m							
Obstruction Type	'				/_			
Obstruction Height [OH]	m				_			
Obstruction Distance [OD]	m							
Collocated Distance	m							
Unrestricted Airflow	degrees							
Dripline	m	/			*			<u>*</u> (
*	Units	co	GASEO	JS MONITORS OZONE	_	NO,		SO₂
Probe Inlet Height [IH]	m			5.3			/	,
Distance to nearest road	m			64				
Obstruction Type	/			rce				
Obstruction Height [OH]	m			18				
Obstruction Distance [OD]	m			<u>'0</u> √5		-/-		
Collocated Distance	m			-10		/		
Unrestricted Airflow	degrees	_/	-	10				
Dripline	\vdash			10	/			
БПР ППЕ	/	/		38	<u> </u>	YES/NO		PASS/FAIL
Are all probes at least 1 m	eter apa	rt?			1	leg		
		nat is paved or has vegetative gr			,	Yes		
		least 2 meters away from any				Yes		
		restricted airflow around the pr	robe or sa	mpler,				PASS PASS
Obstruction Distance MUS Dripling must be at least 1		y when tree is an obstruction.					189	<u> </u>
Tripline Hidde De de least 1	.Siri awa	when tree is an obstruction.				1de		PASS
Sampler Inlet Height [IH	Î	Probe Height [IM]						Obsturction Height OH
V 4	, LL	4 4				-	* 0	0
		Obstruction Distance	e [OD]					

4.3 LOCKELAND ELEMENTARY ("LL") 2024 SITE ASSESSMENT

Figure 4-11: "LL" NORTH-Facing VIEW



Figure 4-12: "LL" EAST-FACING VIEW



Figure 4-13: "LL" SOUTH-FACING VIEW



Figure 4-14: "LL" WEST-FACING



Figure 4-15: "LL" 2024 Site Assessment Form

Revision 1		SITIN		IATION FIELD FO	RM		Rev. 5/01/23		
	Metro Public Health Department Air Pollution Lab								
PCD-AM-020									
Site Name: Lockeland Date: 4/18/24									
AQS I.D:				Time: 9.00					
Coordinates:	36.176, -86,738			Ins	pected by:	GIL.			
Scale:		leigh borhood		8	Signature:	1 1	24		
EQUIPMENT USED DURRING EVALUATION (List Below)									
	Units	PM _{2.5}	PARTICUL	ATE MONITORS PM _{2.5}	(FRM)		PM ₁₀ / PM _{2.5} (AQI)		
Probe Inlet Height [IH]	m	5.8		5.8			5.8		
Distance to nearest road	: m i	66		60			(06		
Obstruction Type	/	Bulling			ding		Building		
Obstruction Height [OH]	m	C, I		6	. 1		6.1		
Obstruction Distance [OD]	m	19.0		2	0.5		18.5		
Collocated Distance	m	3			3				
Unrestricted Airflow	degrees	380			80		280		
Dripline	m '	3 <i>O</i>	2:		30	30			
	Units	со	GASEOU	OZONE	NO _x		SO ₂		
Probe Inlet Height [IH]	m								
Distance to nearest road	m						/		
Obstruction Type	1								
Obstruction Height [OH]	m				/				
Obstruction Distance [OD]	m								
Collocated Distance	m								
Unrestricted Airflow	degrees								
Dripline	m /					/	/		
Are all probes at least 1 m	oter anarta				YES/NO		PASS/FAIL		
		is paved or has vegetative g	round cove	er?	Y25				
		ast 2 meters away from any			Yes Yes				
		tricted airflow around the p			125		PASS		
Obstruction Distance MUS	ST be ≥ 2*(O	н - ін).					PASS		
Dripline must be at least 10m away when tree is an obstruction.									
±									
Sampler Inlet Height [IH] Probe Height [IH] Obsturction Height [OH]									
Inlet H				9	T. AND	Fion He			
Sampler		Probe Height [IH]				Obsturd			
- J	ų Clar	4 4 14	1001		-	•			
Obstruction Distance [OD]									

4.4 NEAR ROAD ("NRS") 2024 SITE ASSESSMENT

Figure 4-16: "NRS" NORTH-FACING



Figure 4-17: "NRS" EAST-FACING



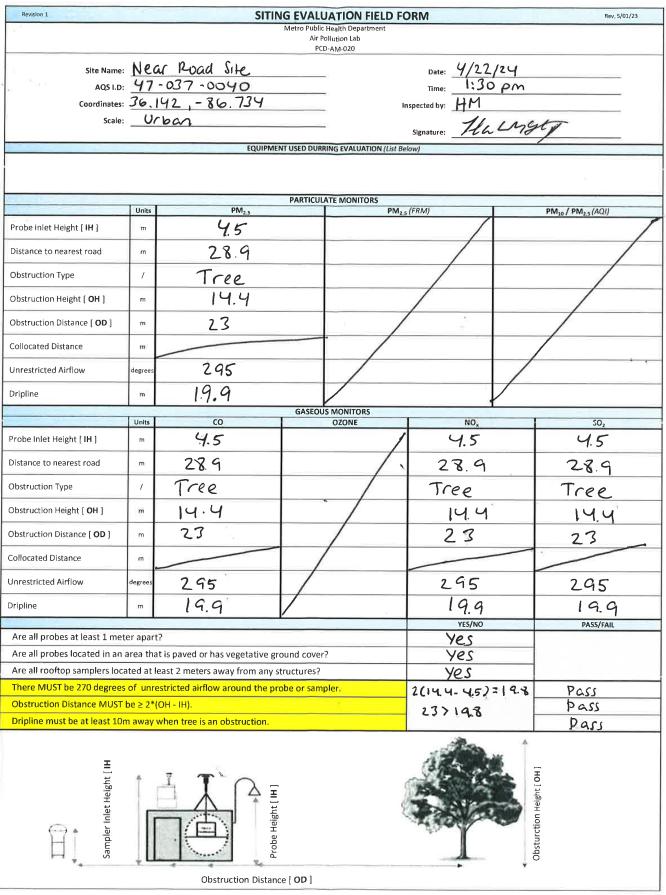
Figure 4-18: "NRS" SOUTH-FACING VIEW



Figure 4-19: "NRS" WEST-FACING VIEW



Figure 4-20: "NRS" 2024 Site Assessment Form



APPENDIX A: SITE EVALUATION FORM [PCD-AM-020]

	SITING EVALUATION FIELD FORM Rev. 4/12/73 Metro Public Health Department										
Air Pollution Lab PCD-AM-020											
Site Name: Date:											
AQS1.D:											
Coordinates:	}		2	Inspected by:							
Scale:			c.	Signature:							
LIST EQUIPMENT USED											
PARTICULATE MONITORS											
	Units	PM2.5	1740		ollocated		PM10				
Probe Inlet Height (IH]	m										
Distance to nearest road	m										
Obstruction Type	1										
Obstruction Height [OH]	m										
Obstruction Distance [OD]	m										
Collocated Distance	m										
Unrestricted Airflow	degrees										
Dripline	m										
			GA!	SEOUS MONITORS							
	Units	со		OZONE	NOx		SO2				
Probe Inlet Height (IH]	m										
Distance to nearest road	m										
Obstruction Type	j										
Obstruction Height (OH)	m										
Obstruction Distance [OD]	m										
Collocated Distance	m										
Unrestricted Airflow	degrees										
Dripline	m										
Are all probes at least 1 meter apa	+?				YES/NO		PASS/FAIL				
Are all probes located in an area th		ed or has vegetative ground cover?									
Are all rooftop samplers located at											
There MUST be 270 degrees of un	estricted	airflow around the probe or sampler.									
Obstruction Distance MUST be ≥ 2		t to the second									
Dripline must be at least 10m away	when tre	ee is an obstruction.									
Obstruction Height [OH]											