



Chase Tower, 17th Floor
P.O. Box 1588
Charleston, WV 25326-1588
(304) 353-8000 (304) 353-8180 Fax
www.steptoe-johnson.com

Writer's Contact Information

January 31, 2018

The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency
Mail Code 1101A
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: EPA Response to Certain State Designation Recommendations;
Docket No. EPA-HQ-OAR-2017-0548.

Dear Administrator Pruitt:

The attached comments of the Midwest Ozone Group (“MOG”) are offered in response to the U.S. Environmental Protection Agency’s response to certain state designation recommendations for the 2015 ozone National Ambient Air Quality Standard (NAAQS). 83 Fed. Reg. 651 (January 5, 2018).

In these comments, MOG brings to the agency’s attention the significant impact on monitored ozone concentrations resulting from Exceptional Events. While we recognize that there have been numerous Exceptional Events in recent years, these comments will focus on the significant Exceptional Events related to wildfires that occurred in Canada in May and July 2016. The comments include data that graphically illustrate the impact on 2014-2016 ozone design values when these Exceptional Events are not recognized and excluded from ozone measurements made during the May and July 2016 time periods. The effect of excluding these impacted monitoring data is to significantly lower the 2014-2016 ozone design values. Utilizing the correct design values for these monitors is critical to the designation process as well as the computer modeling of the future year attainment status of these monitors.

Thank you for the opportunity to provide comments on this important issue.

Very truly yours,

A handwritten signature in blue ink that reads "David M. Flannery".

David M. Flannery
Legal Counsel
Midwest Ozone Group

**COMMENTS OF THE MIDWEST OZONE GROUP
REGARDING EPA'S RESPONSE TO CERTAIN STATE
DESIGNATION RECOMMENDATIONS FOR THE 2015 OZONE
NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS).**

83 Fed. Reg. 651 (January 5, 2018).

JANUARY 31, 2018

**COMMENTS OF THE MIDWEST OZONE GROUP
REGARDING EPA'S RESPONSE TO CERTAIN STATE DESIGNATION
RECOMMENDATIONS FOR THE 2015 OZONE NATIONAL AMBIENT AIR
QUALITY STANDARDS (NAAQS).¹
83 Fed. Reg. 651 (January 5, 2018).**

JANUARY 31, 2018

A. INTRODUCTION.

These comments are offered with respect to the U.S. Environmental Protection Agency's response to certain state designation recommendations for the 2015 ozone National Ambient Air Quality Standard (NAAQS). 83 Fed. Reg. 651 (January 5, 2018). EPA has asked for comments to be received on this matter on or before February 5, 2018.

These comments are filed on behalf of the Midwest Ozone Group (MOG). MOG is an affiliation of companies, trade organizations, and associations that has drawn upon its collective resources to seek solutions to the development of legally and technically sound national ambient air quality management program.² MOG's primary effort is to work with policy makers in evaluating air quality policies by encouraging the use of sound science. MOG has been actively engaged in a variety of EPA issues and initiatives related to the development and implementation of air quality policy, including the development of transport rules, the implementation of NAAQS standards, responses to petitions under 176A and 126 of the Clean Air Act, and support for state developed alternatives to EPA transport rules. MOG members and participants operate more than 85,000 MW of coal-fired and coal-refuse fired generation in more than ten states. They are concerned about the development of technically unsubstantiated interstate air pollution rules and the impacts on their facilities, their employees, their contractors, and the consumers of their electric power.

B. REGULATORY BACKGROUND.

In its notice of availability of EPA's responses, the agency specifically solicits comment on whether its proposed designations are supported by data collected at the various monitors that are available to the agency for this purpose. These comments will point out that in the case of many of the monitors relied upon by the states and EPA, the data being reported for those monitors has been

1 Questions or inquiries about these comments should be directed to David M. Flannery, Kathy G. Beckett, or Edward L. Kropf, Legal Counsel, Midwest Ozone Group, Steptoe & Johnson PLLC, 707 Virginia Street East, Charleston West Virginia 25301; 304-353-8000; dave.flannery@steptoe-johnson.com and kathy.beckett@steptoe-johnson.com and skipp.kropp@steptoe-johnson.com respectively. These comments were prepared with the technical assistance of Alpine Geophysics, LLC.

2 The members of and participants in the Midwest Ozone Group include: American Coalition for Clean Coal Electricity, American Electric Power, American Forest & Paper Association, Ameren, Alcoa, ARIPPA, Associated Electric Cooperative, Citizens Energy Group, Council of Industrial Boiler Owners, Duke Energy, East Kentucky Power Cooperative, FirstEnergy, Indiana Energy Association, Indiana Utility Group, LGE / KU, Ohio Utility Group, Olympus Power, and the Springfield (IL) City Water P&L.

influenced by Exceptional Events. As will be discussed more specifically later in these comments, consideration of this data provides an appropriate basis for removing that data from the calculation of the 3 year design values, which could materially change the basis for the agency's designations of nonattainment with the 2015 ozone NAAQS as well as predicted ozone concentration in the attainment year.

While the agency has recognized these Exceptional Events in certain cases, there are many other instances in which data from monitors related to the same Exceptional Events have not been excluded. This has resulted in higher design values for many monitors. If not corrected use of these higher design values will not only result in unnecessarily stringent, inaccurate nonattainment designations but also in ultimately higher future year predictions of ozone concentrations.

The importance of the need to exclude data influenced by Exceptional Events has been recognized by Congress in the provisions of Clean Air Act §319(b)(3)(B) which provides as follows:

Regulations promulgated under this section shall, at a minimum, provide that –

(i) the occurrence of an exceptional event must be demonstrated by reliable, accurate data that is promptly produced and provided by Federal, State, or local government agencies;

(ii) a clear causal relationship must exist between the measured exceedances of a national ambient air quality standard and the exceptional event to demonstrate that the exceptional event caused a specific air pollution concentration at a particular air quality monitoring location;

(iii) there is a public process for determining whether an event is exceptional; and

(iv) there are criteria and procedures for the Governor of a State to petition the Administrator to exclude air quality monitoring data that is directly due to exceptional events from use in determinations by the Administrator with respect to exceedances or violations of the national ambient air quality standards.

EPA responded to the mandate by the adoption of regulations, including most recently 40 CFR 50.14 (81 Fed. Reg. 68216, October 3, 2016) which provides the regulatory framework for addressing Exceptional Events. The regulations include requirements related to demonstrating (a) that a clear, causal relationship exists between the event and monitored exceedance(s) (b) the event was of human origin and not likely to recur or was natural in origins and (3) the occurrence was not reasonably controllable or preventable.

EPA has also offered guidance related to Exceptional Events³ that, among other things, requires that demonstrations include:

- A narrative conceptual model that describes the event(s) causing the exceedance or violation and a discussion of how emissions from the event(s) led to the exceedance or violation at the affected monitor(s);

³ Guidance on the Preparation of Exceptional Events Demonstrations for Wildfire Events that May Influence Ozone Concentrations, Final, EPA, September 2016: https://www.epa.gov/sites/production/files/2016-09/documents/exceptional_events_guidance_9-16-16_final.pdf

- A demonstration that the event affected air quality in such a way that there exists a clear causal relationship between the specific event and the monitored exceedance or violation;
- Analyses comparing the claimed event-influenced concentration(s) to concentrations at the same monitoring site at other times. The Administrator shall not require a State to prove a specific percentile point in the distribution of data;
- A demonstration that the event was both not reasonably controllable and not reasonably preventable;
- A demonstration that the event was caused by human activity that is unlikely to recur at a particular location or was a natural event; and
- Documentation that the submitting air agency followed the public comment process.

Over the years, EPA has had brought to its attention many Exceptional Events that are believed to have had an impact of monitored concentrations.⁴ Following these requirements, several states have already made these demonstrations addressing the May 2016 event. Thus far only Maryland has made a demonstration related to the July 2016 event. Indeed EPA has concurred in at least four demonstration related to the May 2016 event. The demonstrations that have already been made by various states related to the Canadian wildfire in 2016 include:

Connecticut - The Connecticut demonstration related to the May 2016 event was submitted on May 23, 2017.⁵ In addition to showing that Canadian wildfire caused the event, the demonstration noted that “. . . the exceedances of May 25-26th cannot be attributed to EGUs operating on high electric demand days as is more typically the case later in the ozone season.” EPA concurred in that demonstration on July 31, 2017.

Massachusetts - The Massachusetts demonstration related to the May 2016 event was submitted on May 25, 2017.⁶ EPA concurred in that demonstration on September 19, 2017.

New Jersey - The New Jersey demonstration related to the May 2016 was submitted on May 31, 2017.⁷ In addition to showing that Canadian wildfire caused the event in New Jersey, the demonstration also noted that the event had had a similar impact on many other states including Wisconsin, Michigan, Illinois, Indiana, Ohio, Pennsylvania and New York. EPA concurred in that demonstration on October 24, 2017.

Rhode Island - The Rhode Island demonstration related to the May 2016 event was submitted on June 20, 2017.⁸ EPA concurred in that demonstration on September 19, 2017.

4 <https://www.epa.gov/air-quality-analysis/exceptional-events-submissions-table-2007-rule#Ozone>

5 <https://www.epa.gov/air-quality-analysis/exceptional-events-documents-ozone-connecticut>

6 <https://www.epa.gov/air-quality-analysis/exceptional-events-documents-ozone-massachusetts>

7 <https://www.epa.gov/air-quality-analysis/exceptional-events-documents-ozone-new-jersey>

8 <https://www.epa.gov/air-quality-analysis/exceptional-events-documents-ozone-rhode-island>

Ohio - The Ohio demonstration related to the May 2016 event was submitted on November 15, 2017.⁹ We are not aware that EPA has yet addressed the merit of the Ohio demonstration.

Pennsylvania – Pennsylvania has also made a demonstration related to the May 2016 event dated November 2017.¹⁰ We are not aware that EPA has yet addressed the merit of the Pennsylvania demonstration.

Maryland – While the Maryland demonstration dated May 26, 2017, nominally addresses July 2016 event, the demonstration report itself includes data which assesses how the design values for Maryland’s monitors are affected by both the May and July 2016 events.¹¹ In addition to showing that Canadian wildfire caused the events, the demonstration noted that “Daily aggregate NO_x emissions of Indiana, Ohio, West Virginia, Virginia, Pennsylvania Maryland and the District of Columbia for only the month of July from 2010 – 2016 pulled from CAMD showed emissions during late July 2016 were some of the lowest daily emissions ever.” We are not aware that EPA has yet addressed the merit of the Maryland demonstration.

It is clear from these demonstrations that the May and July 2016 events were significant and clearly meet the substantive criteria for concurrence by EPA. While the EPA has historically focused on applying Exceptional Event determinations to those monitors that exceed a NAAQS, extending these determinations to all other affected monitors is critical since doing so would assure that all designations were based on appropriate data. In addition, even for monitor whose attainment status is not changed, accounting for these Exceptional Events would lower the design value for that monitor and increase the critical nonattainment value for each monitor (the ozone concentration in the upcoming ozone season that would be high enough to push a monitor into nonattainment). Moreover, as we move to modeling using a 2014 base case the updated 2016 design values would be directly incorporated into that modeling platform affecting the development of Good Neighbor SIPs and any possible transport rules, state 126 petitions or other planning related to the future attainment year. Finally, appropriately updating these design values would provide a more accurate benchmark for determining if and to what extent upwind states would need to reduce ozone precursor emissions related to transport because that obligation ends when a downwind state achieves attainment of the NAAQS at all monitoring locations.

C. IMPACT ON MONITORS.

We have analyzed all of the monitors in the 11 states that appear to have been affected by the May and July 2016 Exceptional Events. In the case of each monitor we have graphically identified the 10 highest ozone concentrations for each monitor and have highlighted in red those readings that occurred on dates related to the May 2016 and July 2016 events. This compilation can be found in Exhibit A of these comments. These graphics allow a clear picture of the significance of the

9 http://www.epa.state.oh.us/portals/27/SIP/ozone/exepevent_signedUSEPAletter_11-15-17.pdf

10 <http://www.elibrary.dep.state.pa.us/dsweb/Get/Document-117484/Ozone%20EE%20Analysis%20May%202017.pdf>

11 http://www.mde.state.md.us/programs/Air/AirQualityMonitoring/Documents/MDE_JUL_21_22_2016_EE_demo.pdf

elimination of those data points affected by the two Exceptional Events in question. We have selected from the compilation in Exhibit A the following data as examples of how these Exceptional Events impact some of the more significant monitors in each of these 11 states.

1. Connecticut.

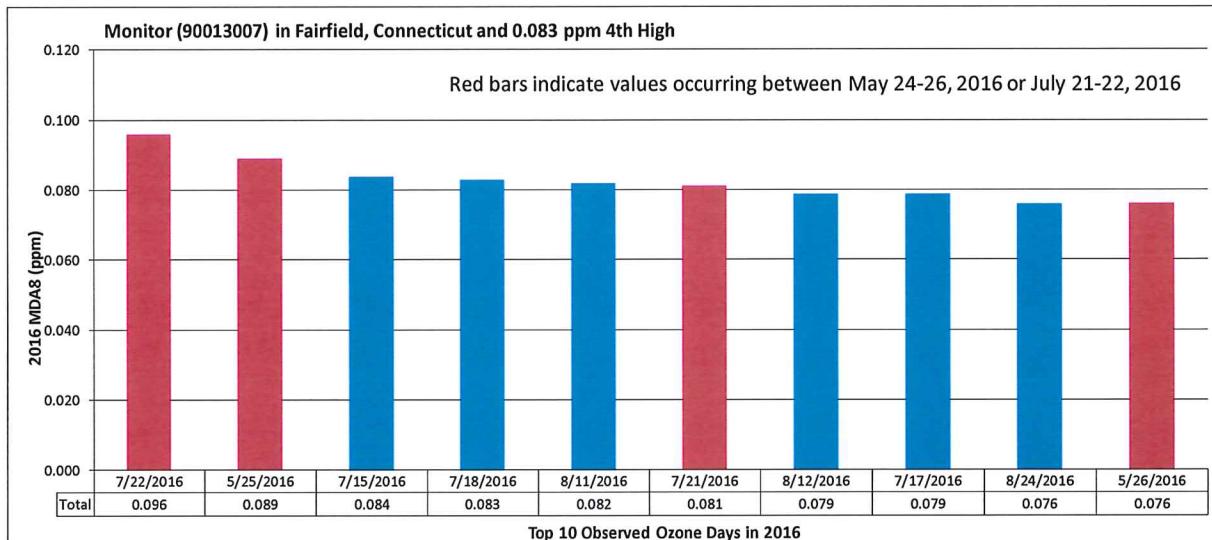
We have selected 3 of Connecticut's monitors - Fairfield (90013007), Fairfield (90019003), and New Haven (90099002) – for emphasis here because they are among the only 6 monitors in the East that are predicted by EPA¹² to be in nonattainment of the 2015 ozone NAAQS in 2023.

AQS_SITE_ID 90013007

Fairfield, Connecticut

Date	Daily MDA8 (ppm)
7/22/2016	0.096
5/25/2016	0.089
7/15/2016	0.084
7/18/2016	0.083
8/11/2016	0.082
7/21/2016	0.081
8/12/2016	0.079
7/17/2016	0.079
8/24/2016	0.076
5/26/2016	0.076

Value	Ozone MDA8 (ppb)
2016 4th (fire)	83
2016 4th (no fire)	79
2014-16 DV (fire)	81
2014-16 DV (no fire)	79



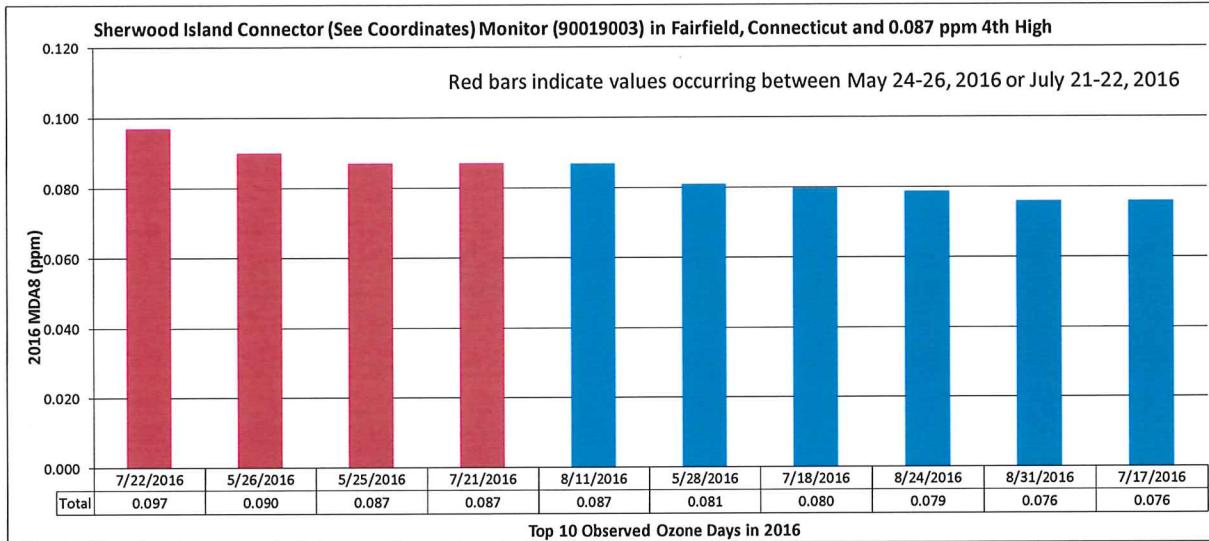
12 Stephen Page memorandum, October 27, 2017: https://www.epa.gov/sites/production/files/2017-10/documents/final_2008_o3_naaqs_transport_memo_10-27-17b.pdf

AQS_SITE_ID 90019003

Fairfield, Connecticut

Date	Daily MDA8 (ppm)
7/22/2016	0.097
5/26/2016	0.090
5/25/2016	0.087
7/21/2016	0.087
8/11/2016	0.087
5/28/2016	0.081
7/18/2016	0.080
8/24/2016	0.079
8/31/2016	0.076
7/17/2016	0.076

Value	Ozone MDA8 (ppb)
2016 4th (fire)	87
2016 4th (no fire)	79
2014-16 DV (fire)	85
2014-16 DV (no fire)	82

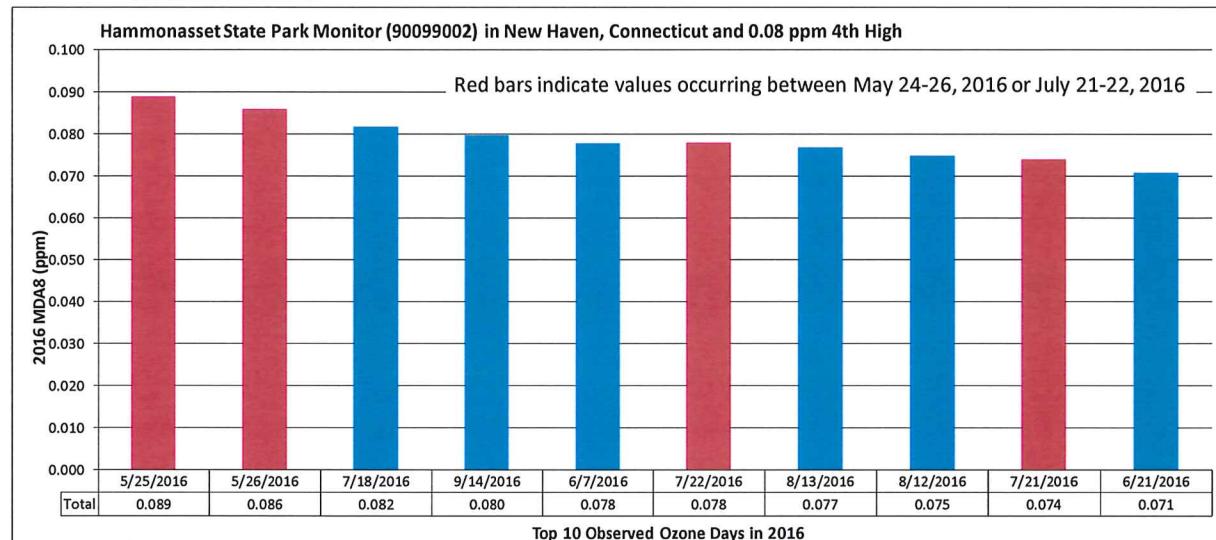


AQS_SITE_ID 90099002

New Haven, Connecticut

Date	Daily MDA8 (ppm)
5/25/2016	0.089
5/26/2016	0.086
7/18/2016	0.082
9/14/2016	0.080
6/7/2016	0.078
7/22/2016	0.078
8/13/2016	0.077
8/12/2016	0.075
7/21/2016	0.074
6/21/2016	0.071

Value	Ozone MDA8 (ppb)
2016 4th (fire)	80
2016 4th (no fire)	77
2014-16 DV (fire)	76
2014-16 DV (no fire)	75



2. New Jersey

We have selected the Hunterdon monitor (340190001) for emphasis here because it is brought into attainment with the 2015 ozone NAAQS when the Exceptional Events data are excluded.

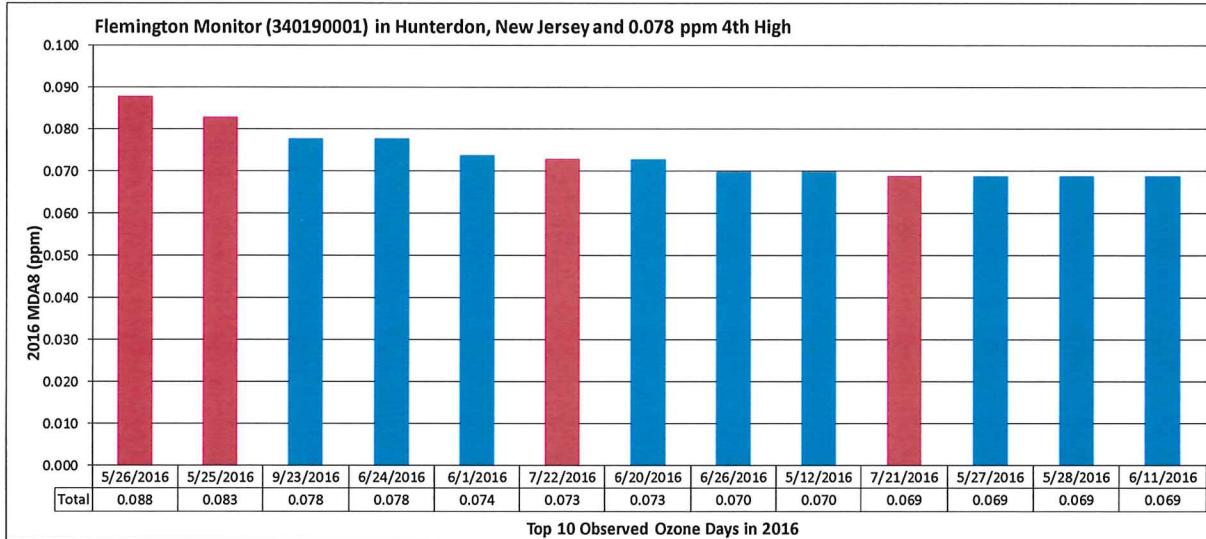
AQS_SITE_ID 340190001

Hunterdon, New Jersey

Date	Daily MDA8 (ppm)
5/26/2016	0.088
5/25/2016	0.083
9/23/2016	0.078
6/24/2016	0.078
6/1/2016	0.074
7/22/2016	0.073
6/20/2016	0.073
6/26/2016	0.070
5/12/2016	0.070
7/21/2016	0.069
5/27/2016	0.069
5/28/2016	0.069
6/11/2016	0.069

Ozone	
Value	MDA8 (ppb)
2016 4th (fire)	78
2016 4th (no fire)	73
2014-16 DV (fire)	72
2014-16 DV (no fire)	70

Red bars indicate values occurring between May 24-26, 2016 or July 21-22, 2016



3. New York

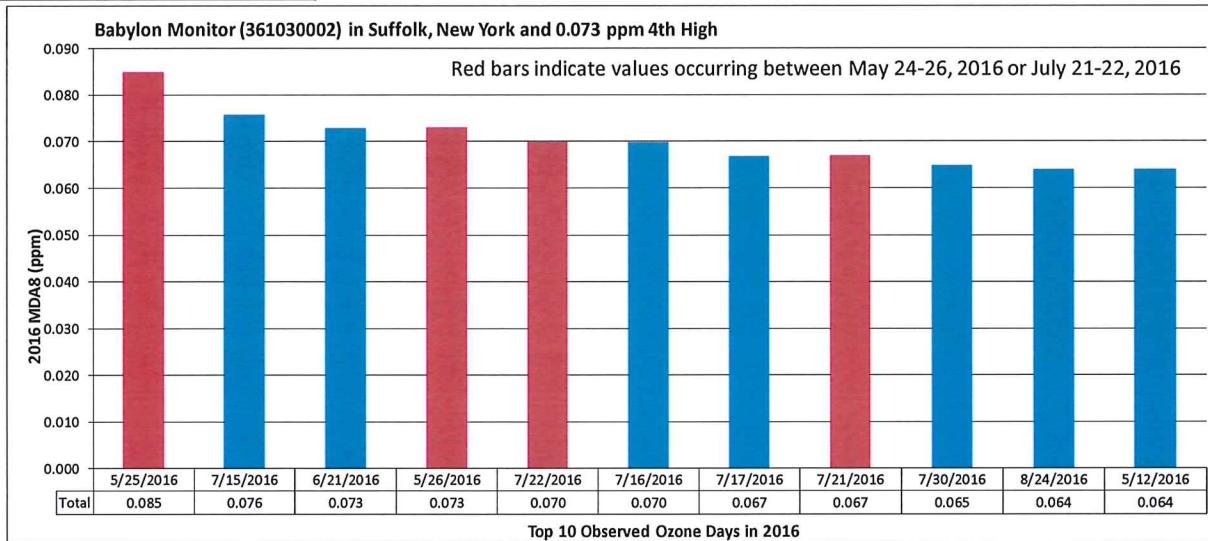
We have selected the Suffolk (361030002) and Richmond (360850067) for emphasis here because they are two of the 6 monitors that EPA 2023 modeling predicts¹³ will exceed to the 2015 ozone NAAQS.

AQS_SITE_ID 361030002

Suffolk, New York

Date	Daily MDA8 (ppm)
5/25/2016	0.085
7/15/2016	0.076
6/21/2016	0.073
5/26/2016	0.073
7/22/2016	0.070
7/16/2016	0.070
7/17/2016	0.067
7/21/2016	0.067
7/30/2016	0.065
8/24/2016	0.064
5/12/2016	0.064

Ozone Value	MDA8 (ppb)
2016 4th (fire)	73
2016 4th (no fire)	67
2014-16 DV (fire)	72
2014-16 DV (no fire)	70



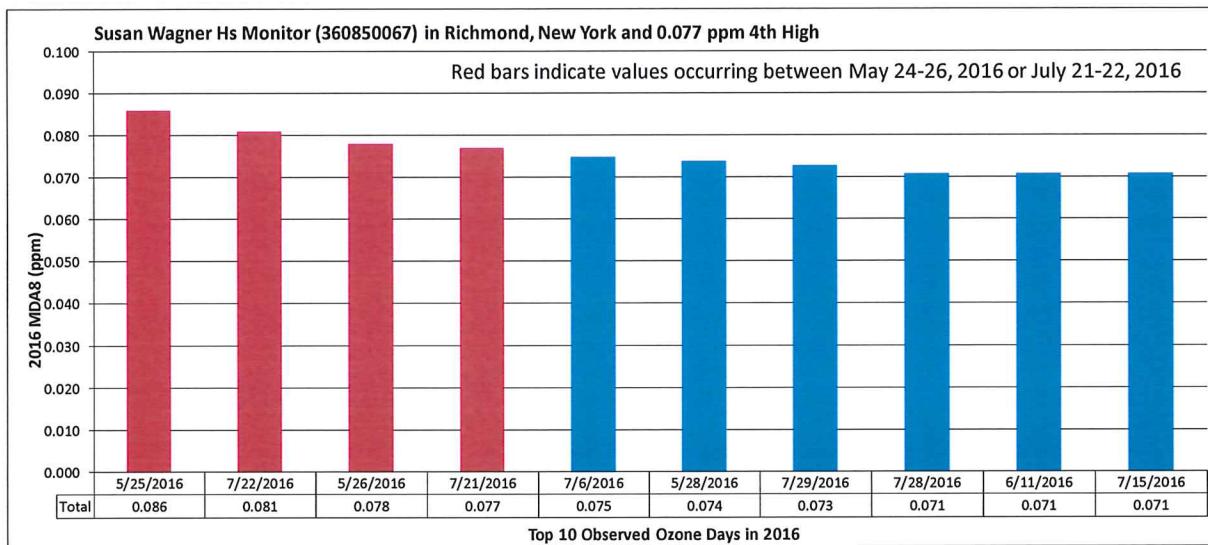
13 Stephen Page memorandum, October 27, 2017: https://www.epa.gov/sites/production/files/2017-10/documents/final_2008_o3_naaqs_transport_memo_10-27-17b.pdf

AQS_SITE_ID 360850067

Richmond, New York

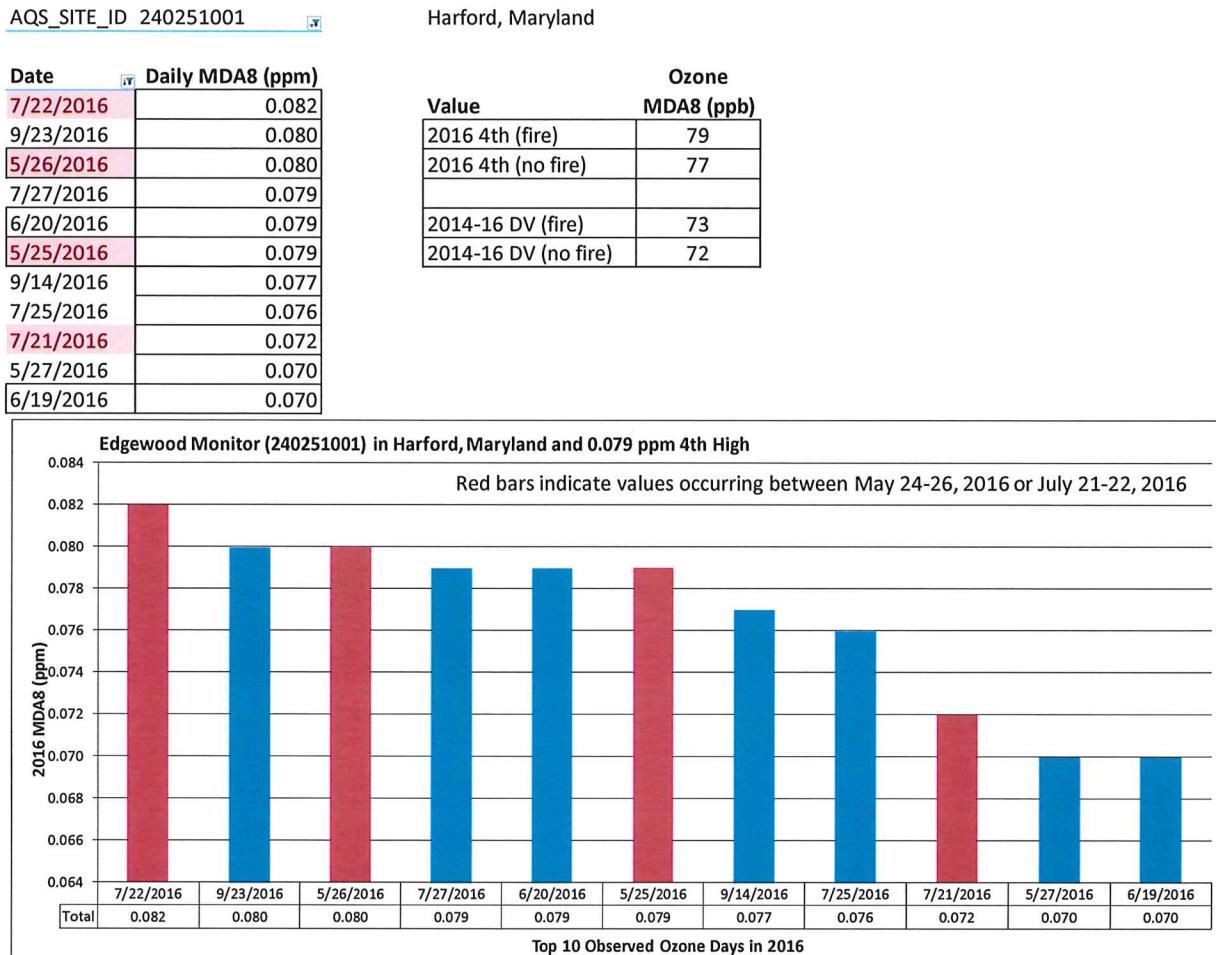
Date	Daily MDA8 (ppm)
5/25/2016	0.086
7/22/2016	0.081
5/26/2016	0.078
7/21/2016	0.077
7/6/2016	0.075
5/28/2016	0.074
7/29/2016	0.073
7/28/2016	0.071
6/11/2016	0.071
7/15/2016	0.071

Value	Ozone MDA8 (ppb)
2016 4th (fire)	77
2016 4th (no fire)	71
2014-16 DV (fire)	76
2014-16 DV (no fire)	74



4. Maryland

We emphasize here the Harford (240251001) monitor because it is one of the 6 monitors that EPA 2023 modeling predicts¹⁴ will be in nonattainment with the 2015 ozone NAAQS. .



14 Stephen Page memorandum, October 27, 2017: https://www.epa.gov/sites/production/files/2017-10/documents/final_2008_o3_naaqs_transport_memo_10-27-17b.pdf

5. Massachusetts

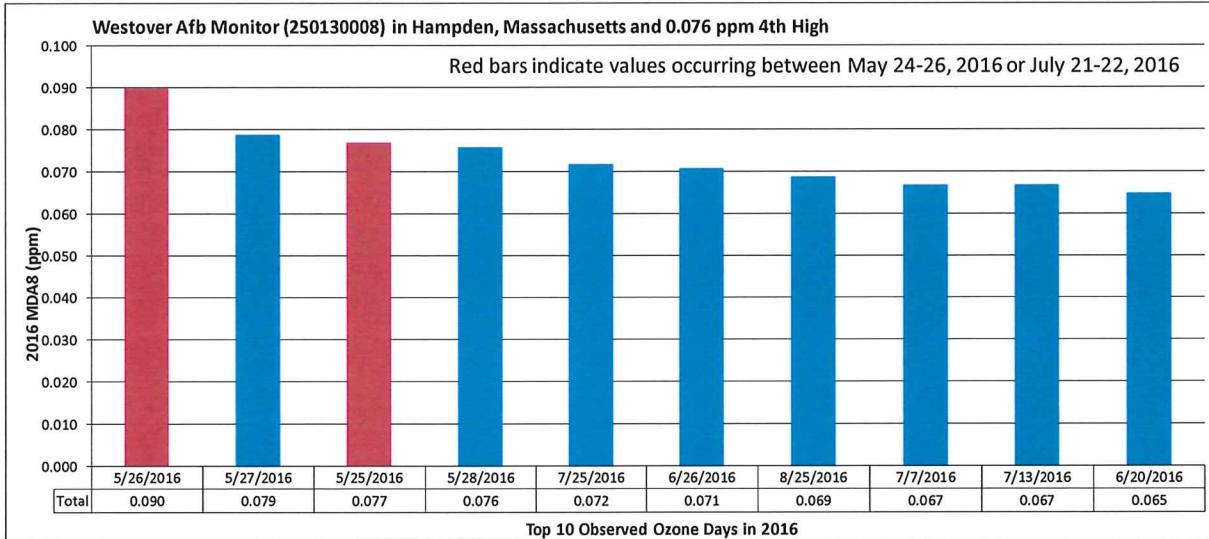
We have selected the Hampden monitor (250130008) for emphasis here because it is one of the highest concentration monitors in the state.

AQS_SITE_ID 250130008

Hampden, Massachusetts

Date	Daily MDA8 (ppm)
5/26/2016	0.090
5/27/2016	0.079
5/25/2016	0.077
5/28/2016	0.076
7/25/2016	0.072
6/26/2016	0.071
8/25/2016	0.069
7/7/2016	0.067
7/13/2016	0.067
6/20/2016	0.065

Value	Ozone MDA8 (ppb)
2016 4th (fire)	76
2016 4th (no fire)	71
2014-16 DV (fire)	70
2014-16 DV (no fire)	68



6. Illinois

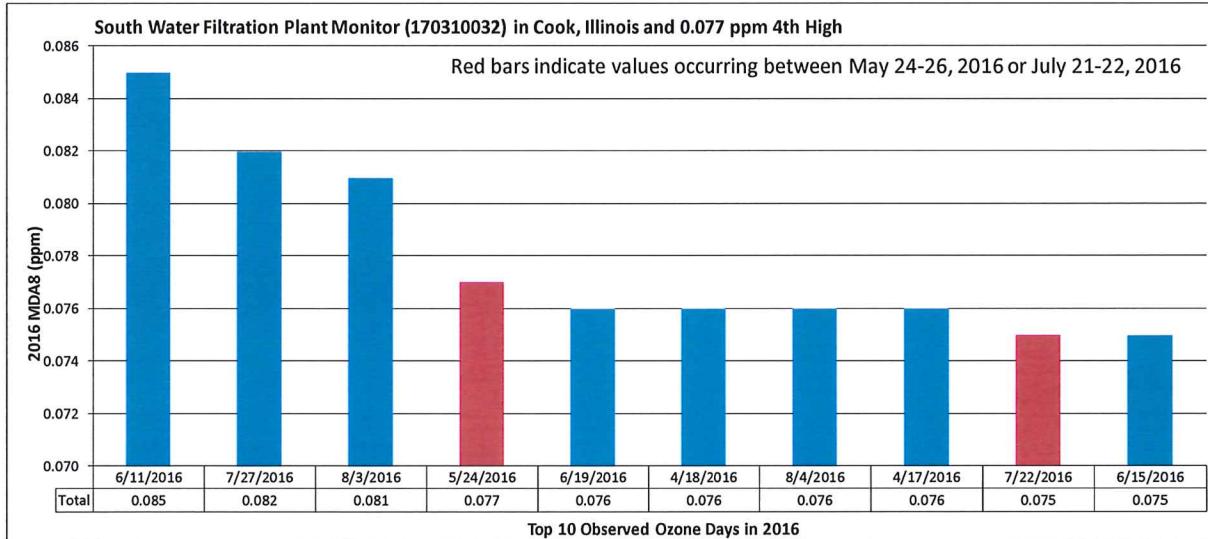
We have selected the Cook (170310032) monitor for emphasis here because it is one of the highest concentration monitors in the state.

AQS_SITE_ID 170310032

Cook, Illinois

Date	Daily MDA8 (ppm)
6/11/2016	0.085
7/27/2016	0.082
8/3/2016	0.081
5/24/2016	0.077
6/19/2016	0.076
4/18/2016	0.076
8/4/2016	0.076
4/17/2016	0.076
7/22/2016	0.075
6/15/2016	0.075

Value	Ozone MDA8 (ppb)
2016 4th (fire)	77
2016 4th (no fire)	76
2014-16 DV (fire)	70
2014-16 DV (no fire)	69



7. Indiana

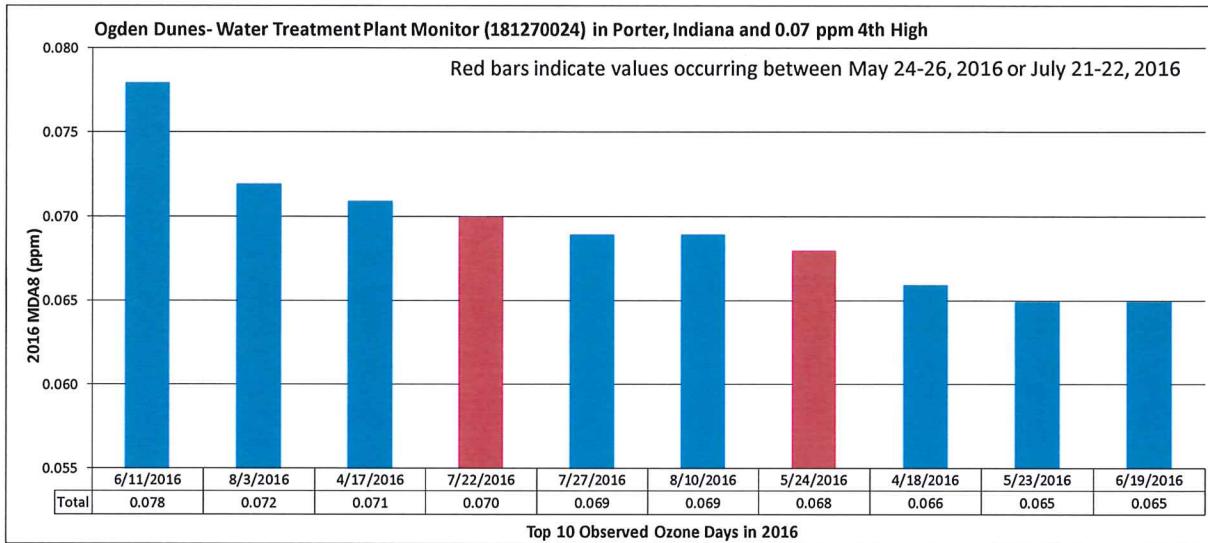
We have selected the Porter (181270024) monitor for emphasis here because it is one of the highest concentration monitors in the state.

AQS_SITE_ID 181270024

Porter, Indiana

Date	Daily MDA8 (ppm)
6/11/2016	0.078
8/3/2016	0.072
4/17/2016	0.071
7/22/2016	0.070
7/27/2016	0.069
8/10/2016	0.069
5/24/2016	0.068
4/18/2016	0.066
5/23/2016	0.065
6/19/2016	0.065

Value	Ozone MDA8 (ppb)
2016 4th (fire)	70
2016 4th (no fire)	69
2014-16 DV (fire)	69
2014-16 DV (no fire)	68



8. Michigan

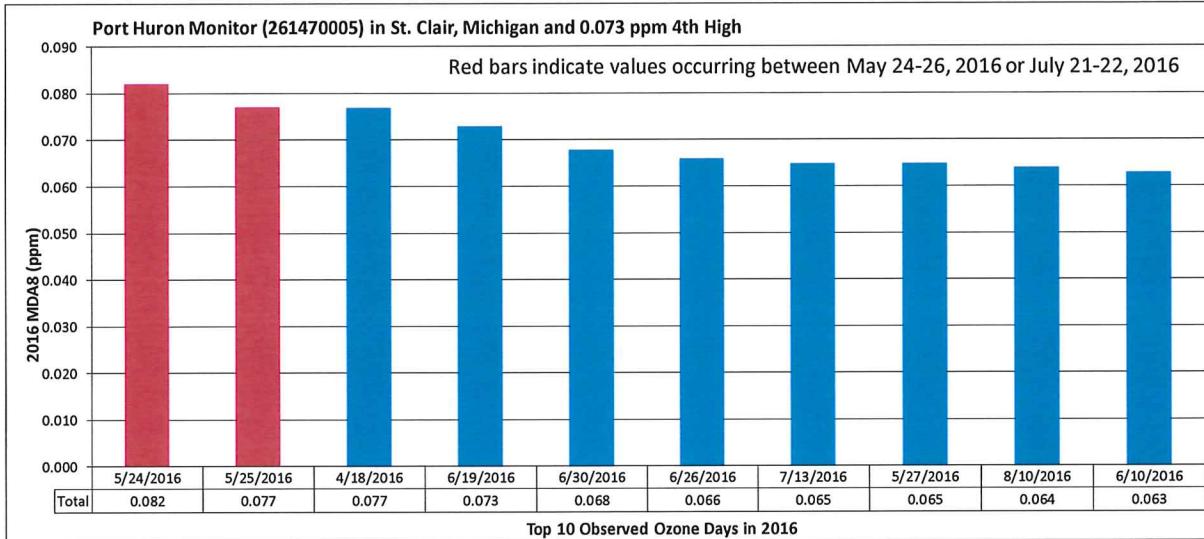
We have selected St. Clair (261470005) for emphasis here because it would be brought into attainment with the 2015 ozone NAAQS with recognition of these events.

AQS_SITE_ID 261470005

St. Clair, Michigan

Date	Daily MDA8 (ppm)
5/24/2016	0.082
5/25/2016	0.077
4/18/2016	0.077
6/19/2016	0.073
6/30/2016	0.068
6/26/2016	0.066
7/13/2016	0.065
5/27/2016	0.065
8/10/2016	0.064
6/10/2016	0.063

Ozone	
Value	MDA8 (ppb)
2016 4th (fire)	73
2016 4th (no fire)	66
2014-16 DV (fire)	73
2014-16 DV (no fire)	70



9. Ohio

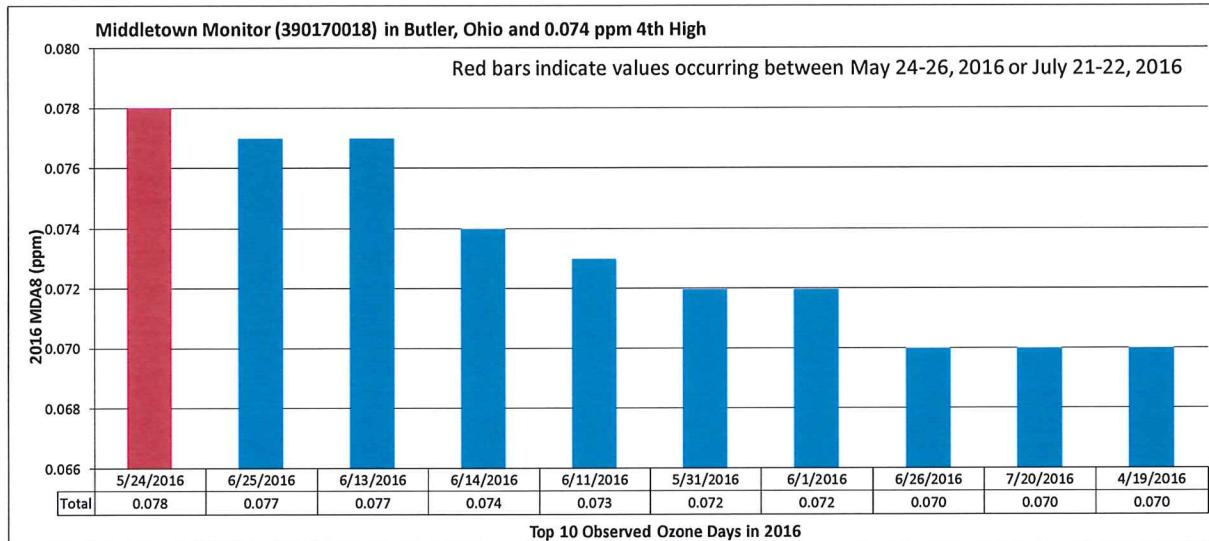
We have selected Butler (390170018) and Geauga (390550004) for emphasis here because they would be brought into attainment with the 2015 ozone NAAQS with recognition of these events.

AQS_SITE_ID 390170018

Butler, Ohio

Date	Daily MDA8 (ppm)
5/24/2016	0.078
6/25/2016	0.077
6/13/2016	0.077
6/14/2016	0.074
6/11/2016	0.073
5/31/2016	0.072
6/1/2016	0.072
6/26/2016	0.070
7/20/2016	0.070
4/19/2016	0.070

Value	Ozone MDA8 (ppb)
2016 4th (fire)	74
2016 4th (no fire)	73
2014-16 DV (fire)	71
2014-16 DV (no fire)	70

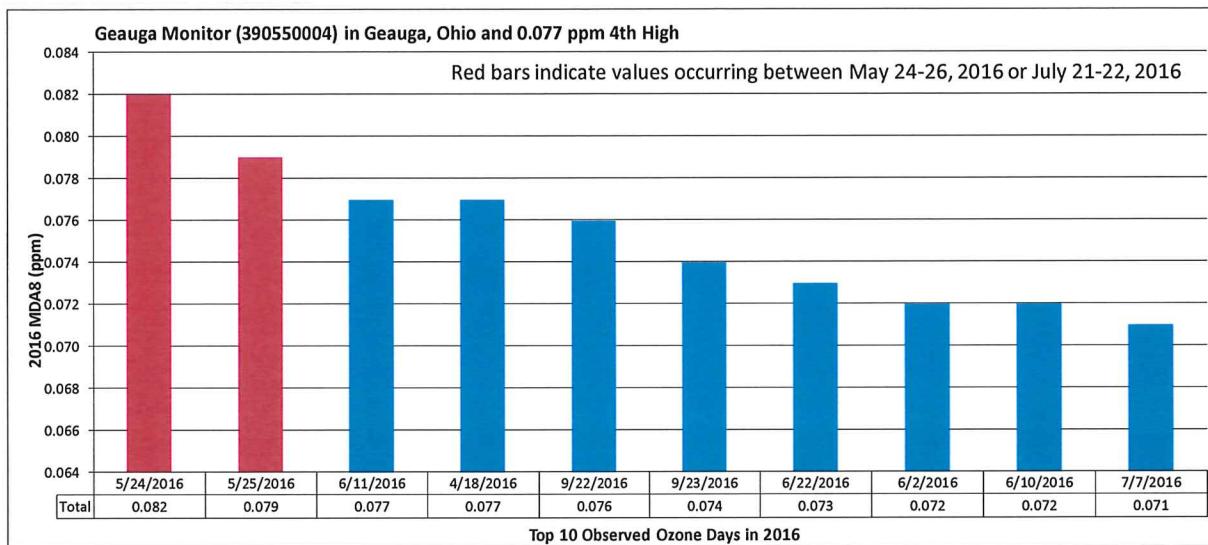


AQS_SITE_ID 390550004

Geauga, Ohio

Date	Daily MDA8 (ppm)
5/24/2016	0.082
5/25/2016	0.079
6/11/2016	0.077
4/18/2016	0.077
9/22/2016	0.076
9/23/2016	0.074
6/22/2016	0.073
6/2/2016	0.072
6/10/2016	0.072
7/7/2016	0.071

Value	Ozone MDA8 (ppb)
2016 4th (fire)	77
2016 4th (no fire)	74
2014-16 DV (fire)	71
2014-16 DV (no fire)	70



10. Pennsylvania

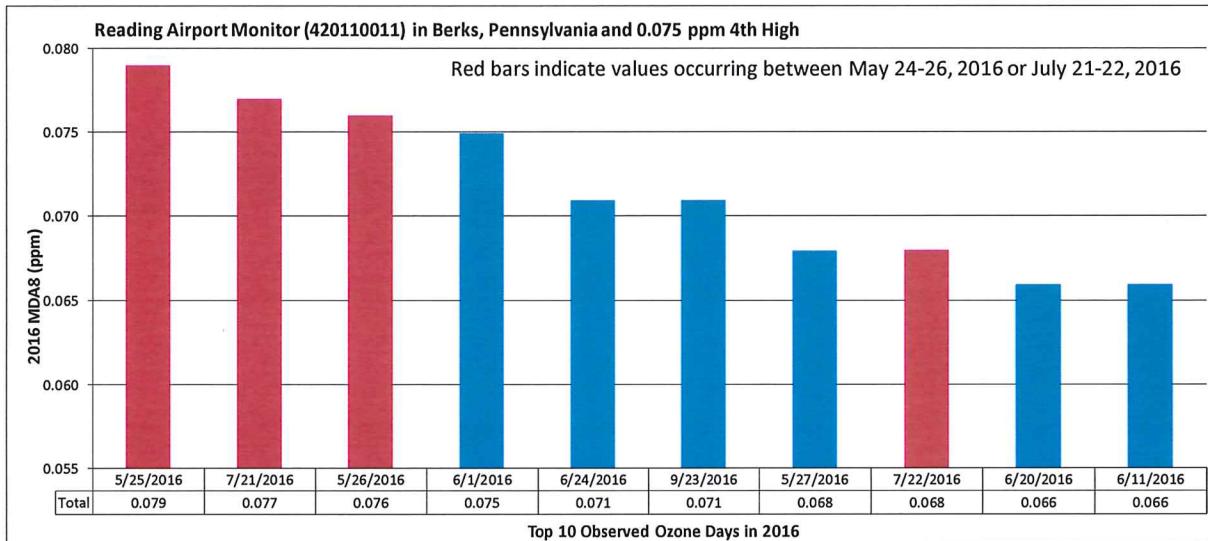
We have selected Berks (420110011), Chester (420290100), and Montgomery (420910013) for emphasis here because all of them would be brought into attainment with the 2015 ozone NAAQS with recognition of these events.

AQS_SITE_ID 420110011

Berks, Pennsylvania

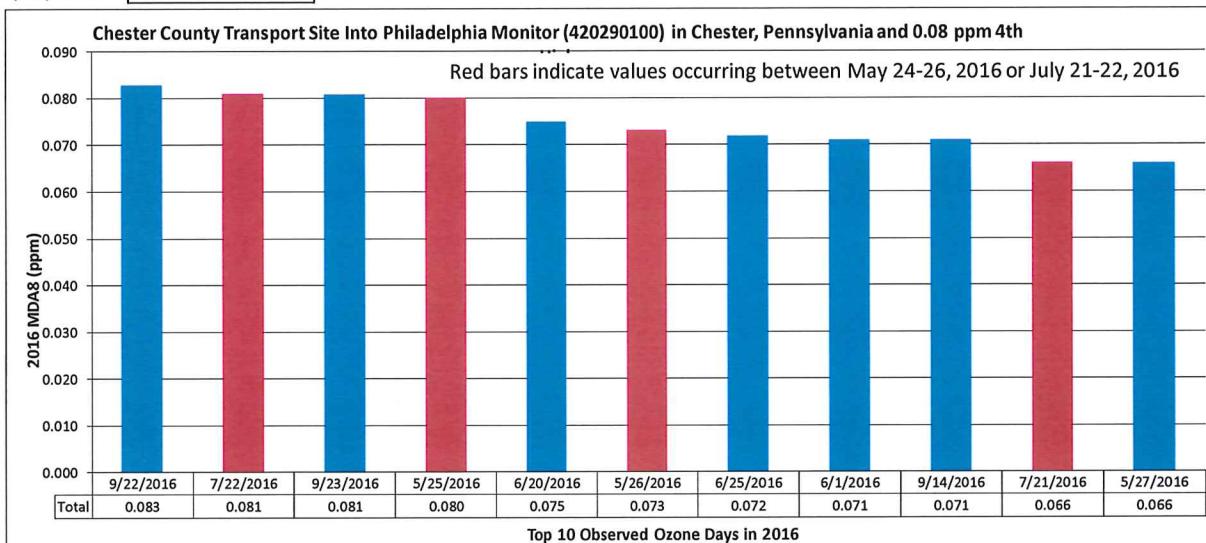
Date	Daily MDA8 (ppm)
5/25/2016	0.079
7/21/2016	0.077
5/26/2016	0.076
6/1/2016	0.075
6/24/2016	0.071
9/23/2016	0.071
5/27/2016	0.068
7/22/2016	0.068
6/20/2016	0.066
6/11/2016	0.066

Value	Ozone MDA8 (ppb)
2016 4th (fire)	75
2016 4th (no fire)	68
2014-16 DV (fire)	71
2014-16 DV (no fire)	69



Date	Daily MDA8 (ppm)
9/22/2016	0.083
7/22/2016	0.081
9/23/2016	0.081
5/25/2016	0.080
6/20/2016	0.075
5/26/2016	0.073
6/25/2016	0.072
6/1/2016	0.071
9/14/2016	0.071
7/21/2016	0.066
5/27/2016	0.066

Value	Ozone MDA8 (ppb)
2016 4th (fire)	80
2016 4th (no fire)	72
2014-16 DV (fire)	73
2014-16 DV (no fire)	70

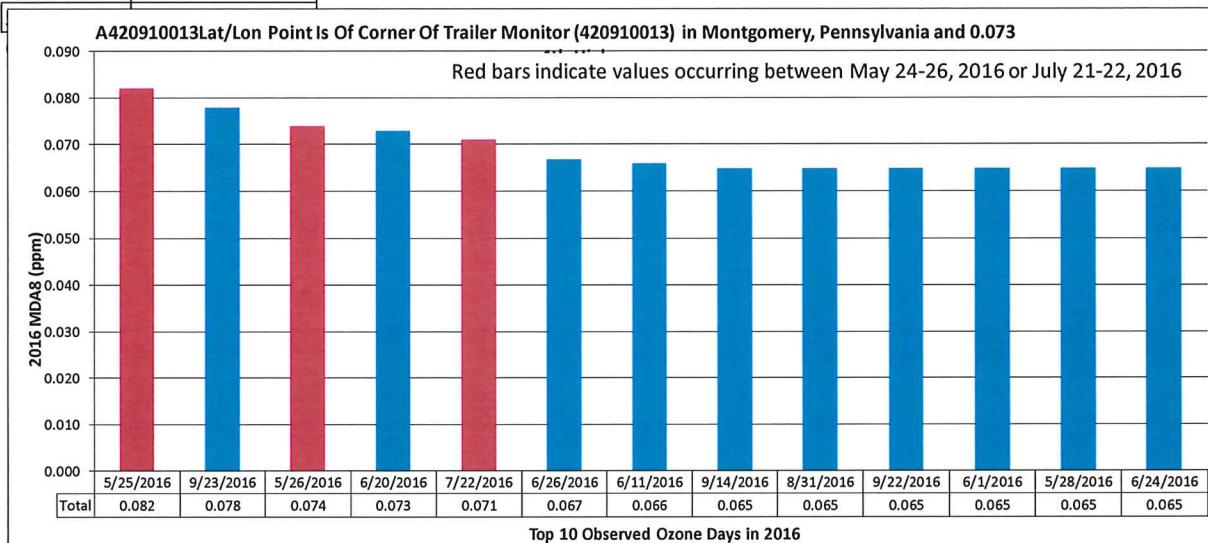


AQS_SITE_ID 420910013

Montgomery, Pennsylvania

Date	Daily MDA8 (ppm)
5/25/2016	0.082
9/23/2016	0.078
5/26/2016	0.074
6/20/2016	0.073
7/22/2016	0.071
6/26/2016	0.067
6/11/2016	0.066
9/14/2016	0.065
8/31/2016	0.065
9/22/2016	0.065
6/1/2016	0.065

Ozone	
Value	MDA8 (ppb)
2016 4th (fire)	73
2016 4th (no fire)	66
2014-16 DV (fire)	72
2014-16 DV (no fire)	70



11. Wisconsin

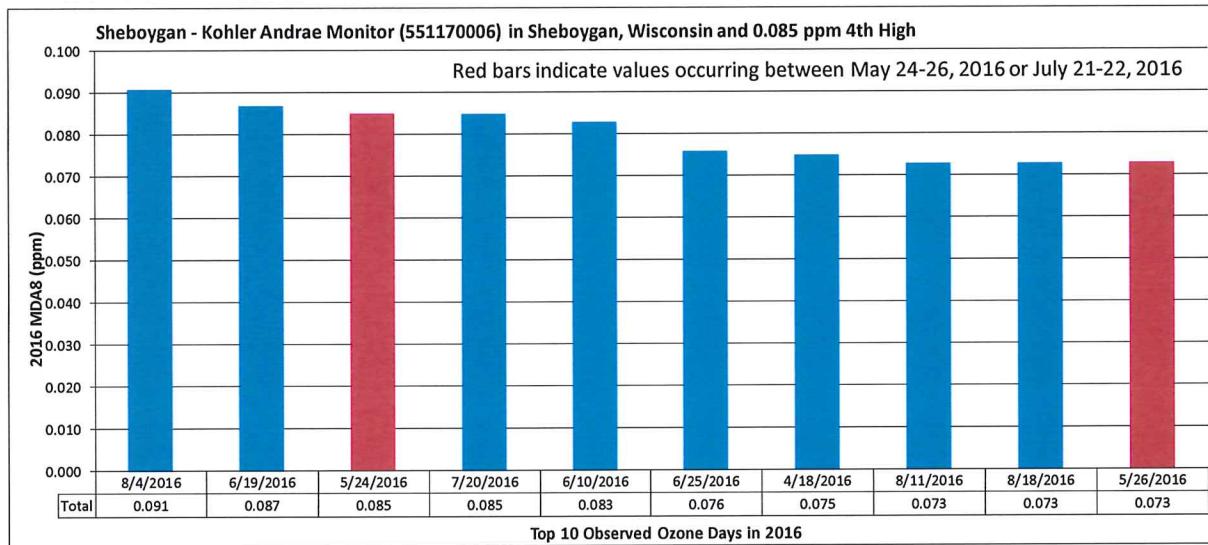
We have selected Sheboygan (551170006) for emphasis here because it has the highest concentration of any of the Wisconsin monitors.

AQS_SITE_ID 551170006

Sheboygan, Wisconsin

Date	Daily MDA8 (ppm)
8/4/2016	0.091
6/19/2016	0.087
5/24/2016	0.085
7/20/2016	0.085
6/10/2016	0.083
6/25/2016	0.076
4/18/2016	0.075
8/11/2016	0.073
8/18/2016	0.073
5/26/2016	0.073

Ozone	
Value	MDA8 (ppb)
2016 4th (fire)	85
2016 4th (no fire)	83
2014-16 DV (fire)	79
2014-16 DV (no fire)	78



D. RECALCULATION OF DESIGN VALUES.

In the case of each monitor, we have removed the measurements taken on days in May and July 2016 impacted by the Fort McMurray wildfires for which Exceptional Events Analysis should have been filed by the affected states, selected a new 4th high value and calculated a new 3 year design value for each monitor for comparison to the data that have thus far been relied upon by EPA and the states. The results of that analysis are set forth in Exhibit B to these comments and summarized below.

1. Connecticut

While EPA has given some recognition to Exceptional Events in its response to the Connecticut recommendations, its actions have only addressed the May 2016 event and only for certain of the Connecticut monitors. As demonstrated by the data included in the “No Fire” column below, there are many monitors in Connecticut that have been influenced by both the May and July, 2016 events and considerations of both of those events at each monitor would result in 8 additional monitors (highlighted in yellow) that would have a lower design value than has thus far been accepted by EPA¹⁵. You will note that we have used red highlighting to identify monitors with values in excess of the 2008 ozone NAAQS and beige highlighting to identify monitors with values in excess of the 2015 ozone NAAQS.

AQS Site ID	State Name	County Name	EPA Accepted 2014-2106		No Fire 2014-2016 Design Value (ppm)
			2014-2016 Design Value (ppm)	Design Value (ppm)	
090010017	Connecticut	Fairfield	0.080	0.080	0.079
090011123	Connecticut	Fairfield	0.078	0.078	0.077
090013007	Connecticut	Fairfield	0.081	0.081	0.079
090019003	Connecticut	Fairfield	0.085	0.083	0.082
090031003	Connecticut	Hartford	0.075	0.074	0.074
090050005	Connecticut	Litchfield	0.074	0.072	0.072
090070007	Connecticut	Middlesex	0.079	0.079	0.077
090090027	Connecticut	New Haven	0.076	0.076	0.075
090099002	Connecticut	New Haven	0.076	0.076	0.075
090110124	Connecticut	New London	0.072	0.072	0.072
090131001	Connecticut	Tolland	0.073	0.073	0.072
090159991	Connecticut	Windham	0.070	0.068	0.068

15 https://www.epa.gov/sites/production/files/2017-12/documents/greater_ct.designations_120_day.tsd_.final_.pdf

We note that applying the May and July 2016 Exceptional Events consideration results in 2 of the monitors, (New Haven (090090027) and New Haven (90099002), measuring attainment of the 2008 ozone NAAQS.

Significantly, three of the above Connecticut monitors - Fairfield (90019003), Fairfield (90013007) and New Haven (90099002) – are among the only 6 monitors in the East that are predicted by EPA to be in nonattainment of the 2015 ozone NAAQS in 2023.¹⁶ It is worthwhile noting that EPA’s modeling of Fairfield (90013007) in 2023 shows it to have a predicted ozone design value of 71.2 ppb while an application of both the May and July 2016 Exceptional Events would lower the 2014-2016 design value for this monitor by an additional 2 ppb which is certain to result in a lower predicted 2023 ozone design value. The same is true for Fairfield (90019003) (which EPA projects would have a 2023 ozone design value of 72.7 ppb) and which is likely to have its 2016 design value lower by 1 ppb with consideration of these Exception Events. A similarly result is likely to occur at New Haven (90099002) which EPA project to have a 2023 ozone design value of 71.2 and additional Exceptional Event benefit of 1 ppb.

2. New Jersey

While EPA has given some recognition to Exceptional Events in its response to the New Jersey Exceptional Events demonstration, its actions have only addressed the May 2016 event and only for certain of the New Jersey monitors. As is illustrated below there are many monitors in New Jersey that have been influenced by these events and considerations of those events at each monitor would result in 13 additional monitors (highlighted in yellow) that would have a lower design value than has thus far been accepted by EPA¹⁷.

AQS Site	ID	State Name	County Name	EPA		No Fire 2014-2016
				2014-2016 Design Value (ppm)	Accepted 2014-2106 Design Value (ppm)	
	340010006	New Jersey	Atlantic	0.064	0.064	0.064
	340030006	New Jersey	Bergen	0.074	0.074	0.073
	340070002	New Jersey	Camden	0.075	0.075	0.074
	340071001	New Jersey	Camden	0.069	0.069	0.068
	340110007	New Jersey	Cumberland	0.068	0.068	0.067
	340130003	New Jersey	Essex	0.070	0.070	0.069
	340150002	New Jersey	Gloucester	0.074	0.074	0.073
	340170006	New Jersey	Hudson	0.072	0.072	0.072

16 Stephen Page memorandum, October 27, 2017: https://www.epa.gov/sites/production/files/2017-10/documents/final_2008_o3_naaqs_transport_memo_10-27-17b.pdf

17 https://www.epa.gov/sites/production/files/2017-12/documents/ny_nj_ct_new_york-northern_new_jersey-long_island_120d_tsds_final.pdf

340190001	New Jersey	Hunterdon	0.072	0.072	0.070
340210005	New Jersey	Mercer	0.072	0.072	0.071
340219991	New Jersey	Mercer	0.073	0.073	0.073
340230011	New Jersey	Middlesex	0.074	0.074	0.074
340250005	New Jersey	Monmouth	0.070	0.070	0.069
340273001	New Jersey	Morris	0.069	0.069	0.068
340290006	New Jersey	Ocean	0.073	0.073	0.072
340315001	New Jersey	Passaic	0.070	0.070	0.068
340410007	New Jersey	Warren	0.064	0.064	0.063

It is noteworthy that consideration of both the May and July 2016 Exceptional Events results in the Hunterdon monitor (340190001) monitoring attainment of the 2015 ozone NAAQS.

3. New York

Even though Connecticut and New Jersey requested consideration of Exceptional Events for at least the May 2016 event, New York has not filed an Exceptional Event Analysis for either the May or July 2016 Exceptional Events. Yet as can be seen from the following data, had the May and July 2016 events been considered, the design values for 25 of New York's monitors (highlighted in yellow) would be significantly lower than has thus far been accepted by EPA¹⁸.

AQS Site	ID	State Name	County Name	EPA		
				Accepted 2014-2106	No Fire 2014-2016	
					Design Value	(ppm)
360010012	360010012	New York	Albany	0.064		0.063
360050110	360050110	New York	Bronx	0.067	0.067	0.066
360050133	360050133	New York	Bronx	0.070	0.070	0.070
360130006	360130006	New York	Chautauqua	0.068		0.067
360270007	360270007	New York	Dutchess	0.068	0.068	0.067
360290002	360290002	New York	Erie	0.069		0.068
360310002	360310002	New York	Essex	0.062		0.061
360310003	360310003	New York	Essex	0.065		0.063
360319991	360319991	New York	Essex	0.058		0.058
360337003	360337003	New York	Franklin	0.058		0.057
360410005	360410005	New York	Hamilton	0.060		0.059
360430005	360430005	New York	Herkimer	0.063		0.058
360450002	360450002	New York	Jefferson	0.063		0.062

18 https://www.epa.gov/sites/production/files/2017-12/documents/ny_nj_ct_new_york-northern_new_jersey-long_island_120d_tsd_final.pdf

360551007	New York	Monroe	0.063		0.063
360610135	New York	New York	0.069	0.069	0.068
360631006	New York	Niagara	0.066		0.065
360671015	New York	Onondaga	0.064		0.062
360715001	New York	Orange	0.066	0.066	0.065
360750003	New York	Oswego	0.060		0.060
360790005	New York	Putnam	0.068	0.068	0.068
360810124	New York	Queens	0.069	0.069	0.067
360850067	New York	Richmond	0.076	0.076	0.074
360870005	New York	Rockland	0.072	0.072	0.071
360910004	New York	Saratoga	0.063		0.062
361010003	New York	Steuben	0.059		0.059
361030002	New York	Suffolk	0.072	0.072	0.070
361030004	New York	Suffolk	0.072	0.072	0.070
361030009	New York	Suffolk	0.066		0.065
361099991	New York	Tompkins	0.063		0.061
361173001	New York	Wayne	0.064		0.063
361192004	New York	Westchester	0.074	0.074	0.072

We also note that applying these additional Exceptional Event considerations results in the Suffolk (361030002) and Suffolk (361030004) measuring attainment of the 2015 ozone NAAQS and in Richmond (360850067) measuring attainment of the 2008 ozone NAAQS.

Improvements in the design value for Suffolk (361030002) and Richmond (360850067) are especially important because they are two of the 6 monitors that EPA 2023 modeling predicts¹⁹ will be in nonattainment with the 2015 ozone NAAQS. The lowering of the 2016 design value for these two monitors will go a long towards addressing these predicted exceedances.

4. Maryland

While Maryland has addressed in its Exception Events demonstration, the impact of both the May and July 2016 events, EPA has not yet recognized those in its ANPR. As is illustrated below there are many monitors in Maryland that have been influenced by these events and consideration of those events at each monitor would result in 14 additional monitors (highlighted in yellow) that would have a lower design value than has thus far been accepted by EPA²⁰.

19 Stephen Page memorandum, October 27, 2017: https://www.epa.gov/sites/production/files/2017-10/documents/final_2008_o3_naaqs_transport_memo_10-27-17b.pdf

20 https://www.epa.gov/sites/production/files/2017-12/documents/md_120d_ts_final.pdf

AQS Site	ID	State Name	County Name	EPA Accepted 2014-2106		No Fire 2014-2016 Design Value (ppm)
				2014-2016 Design Value (ppm)	Design Value (ppm)	
240031003	Maryland	Anne Arundel				
240051007	Maryland	Baltimore	0.072	0.072	0.072	
240053001	Maryland	Baltimore	0.072	0.072	0.072	
240053474	Maryland	Baltimore				
240090011	Maryland	Calvert	0.069	0.069	0.068	
240130001	Maryland	Carroll	0.068	0.068	0.066	
240150003	Maryland	Cecil	0.076	0.076	0.074	
240170010	Maryland	Charles	0.070	0.070	0.070	
240190004	Maryland	Dorchester	0.064	0.064	0.064	
240199991	Maryland	Dorchester	0.066	0.066	0.065	
240210037	Maryland	Frederick	0.067	0.067	0.066	
240230002	Maryland	Garrett	0.065		0.065	
240251001	Maryland	Harford	0.073	0.073	0.072	
240259001	Maryland	Harford	0.073	0.073	0.072	
240290002	Maryland	Kent	0.070		0.069	
240313001	Maryland	Montgomery	0.068	0.068	0.067	
240330030	Maryland	Prince George's	0.069	0.069	0.068	
240338003	Maryland	Prince George's	0.071	0.071	0.070	
240339991	Maryland	Prince George's	0.068	0.068	0.067	
240430009	Maryland	Washington	0.066	0.066	0.065	
245100054	Maryland	Baltimore (City)	0.069	0.069	0.066	

We also note that applying these additional Exceptional Event considerations result in Prince George (240338003) measuring attainment of the 2015 ozone NAAQS and in Cecil (240150003) attaining the 2008 ozone NAAQS.

Improvement in the design value for Harford (240251001) is especially important because it is one of the 6 monitors that EPA 2023 modeling predicts²¹ will be in nonattainment with the 2015 ozone NAAQS. Current EPA 2023 modeling²² shows that Harford (240251001) will have a predicted design value of 71.4 ppb which will almost certainly be improved by the 1 ppb Exceptional Events improvement in its 2016 design value.

5. Massachusetts

Even though Massachusetts has filed an Exceptional Events demonstration with respect to the

21 Stephen Page memorandum, October 27, 2017: https://www.epa.gov/sites/production/files/2017-10/documents/final_2008_o3_naaqs_transport_memo_10-27-17b.pdf

22 *Id.*

May 2016 event, EPA's response to that state's recommendations does not include the revised data, presumably because all monitors are in attainment. Even so there are many monitors in Massachusetts whose design values have been impacted by the May and July 2016 Exceptional Events. As is illustrated below there are many monitors that have been influenced by these events and considerations of those events at each monitor would result in 13 additional monitors (highlighted in yellow) that would have a lower design value.

AQS Site ID	State Name	County Name	EPA Accepted 2014-2016		
			Design Value (ppm)	Design Value (ppm)	No Fine 2014-2016 Design Value (ppm)
250010002	Massachusetts	Barnstable	0.065		0.064
250051004	Massachusetts	Bristol	0.068		0.065
250051006	Massachusetts	Bristol	0.064		0.062
250070001	Massachusetts	Dukes	0.064		0.062
250092006	Massachusetts	Essex	0.065		0.064
250094005	Massachusetts	Essex	0.064		0.064
250095005	Massachusetts	Essex	0.062		0.062
250112005	Massachusetts	Franklin	0.063		0.062
250130008	Massachusetts	Hampden	0.070		0.068
250154002	Massachusetts	Hampshire	0.070		0.069
250170009	Massachusetts	Middlesex	0.063		0.062
250213003	Massachusetts	Norfolk	0.067		0.066
250230005	Massachusetts	Plymouth	0.064		0.063
250250042	Massachusetts	Suffolk	0.056		0.055
250270015	Massachusetts	Worcester	0.064		0.064
250270024	Massachusetts	Worcester	0.064		0.062

6. Illinois

EPA has not recognized any change to the design values for monitors in Illinois²³ even though the Cook (170310032) monitor highlighted in yellow appears to have been influenced by the May and July 2016 Exceptional Events. We urge EPA to recognize this improvement in design value.

23 https://www.epa.gov/sites/production/files/2017-12/documents/st_louis_o3_desig_120-day_ts_final_0.pdf

AQS Site	ID	State Name	County Name	Value (ppm)	EPA	
					Accepted 2014-2106	No Fire 2014-2016
	170010007	Illinois	Adams	0.062		0.062
	170190007	Illinois	Champaign	0.063		0.063
	170191001	Illinois	Champaign	0.066		0.066
	170230001	Illinois	Clark	0.064		0.064
	170310001	Illinois	Cook	0.069		0.069
	170310032	Illinois	Cook	0.070		0.069
	170310076	Illinois	Cook	0.069		0.069
	170311003	Illinois	Cook	0.069		0.069
	170311601	Illinois	Cook	0.069		0.069
	170313103	Illinois	Cook	0.062		0.062
	170314002	Illinois	Cook	0.066		0.066
	170314007	Illinois	Cook	0.071		0.071
	170314201	Illinois	Cook	0.071		0.071
	170317002	Illinois	Cook	0.072		0.072
	170436001	Illinois	DuPage	0.068		0.068
	170491001	Illinois	Effingham	0.064		0.064
	170650002	Illinois	Hamilton	0.065		0.065
	170831001	Illinois	Jersey	0.068	0.068	0.068
	170859991	Illinois	Jo Daviess	0.065		0.065
	170890005	Illinois	Kane	0.068		0.068
	170971007	Illinois	Lake	0.073		0.073
	171110001	Illinois	McHenry	0.068		0.068
	171132003	Illinois	McLean	0.064		0.064
	171150013	Illinois	Macon	0.066		0.066
	171170002	Illinois	Macoupin	0.064	0.064	0.064
	171190008	Illinois	Madison	0.071	0.071	0.071
	171191009	Illinois	Madison	0.067	0.067	0.067
	171193007	Illinois	Madison	0.071	0.071	0.071
	171199991	Illinois	Madison	0.067	0.067	0.067
	171430024	Illinois	Peoria	0.064		0.064
	171431001	Illinois	Peoria	0.064		0.064
	171570001	Illinois	Randolph	0.067		0.067
	171613002	Illinois	Rock Island	0.062		0.062
	171630010	Illinois	Saint Clair	0.068	0.068	0.068
	171670014	Illinois	Sangamon	0.063		0.063
	171971011	Illinois	Will	0.064		0.064
	172012001	Illinois	Winnebago	0.068		0.068

7. Indiana

EPA has not recognized any change to the design values for monitors in Indiana²⁴ even though many of them have been impacted by the May and July 2016 Exceptional Events. We assume this in part because all Indiana monitors are in attainment. As is illustrated below, there are eight monitors highlighted in yellow that appear to have been influenced by these events. We urge EPA to recognize these improvements in design values.

AQS Site ID	State Name	County Name	EPA Accepted		No Fire 2014-2016 Design Value (ppm)
			2014-2016 Design Value (ppm)	2014-2106 Design Value (ppm)	
180030002	Indiana	Allen	0.063		0.063
180030004	Indiana	Allen	0.063		0.063
180050007	Indiana	Bartholomew	0.068		0.068
180110001	Indiana	Boone	0.066		0.066
180130001	Indiana	Brown	0.061		0.060
180150002	Indiana	Carroll	0.064		0.064
180190008	Indiana	Clark	0.070		0.070
180350010	Indiana	Delaware	0.059		0.059
180390007	Indiana	Elkhart	0.061		0.061
180431004	Indiana	Floyd	0.069		0.069
180550001	Indiana	Greene	0.066		0.066
180570006	Indiana	Hamilton	0.063		0.063
180630004	Indiana	Hendricks	0.060		0.059
180690002	Indiana	Huntington	0.058		0.058
180710001	Indiana	Jackson	0.066		0.066
180810002	Indiana	Johnson	0.060		0.060
180839991	Indiana	Knox	0.065		0.065
180890022	Indiana	Lake	0.067		0.067
180892008	Indiana	Lake	0.065		0.065
180910010	Indiana	LaPorte	0.063		0.062
180950010	Indiana	Madison	0.057		0.057
180970050	Indiana	Marion	0.069		0.069
180970057	Indiana	Marion	0.065		0.065
180970073	Indiana	Marion	0.065		0.065
180970078	Indiana	Marion	0.066		0.066
180970087	Indiana	Marion	0.064		0.063
181090005	Indiana	Morgan	0.064		0.063

24 https://www.epa.gov/sites/production/files/2017-12/documents/oh_ky_in_cincinnati_120d_tsds_final.pdf

181230009	Indiana	Perry	0.067	0.067
181270024	Indiana	Porter	0.069	0.068
181270026	Indiana	Porter	0.066	0.065
181290003	Indiana	Posey	0.066	0.066
181410010	Indiana	St. Joseph	0.062	0.061
181410015	Indiana	St. Joseph	0.068	0.068
181410016	Indiana	St. Joseph	0.066	0.066
181450001	Indiana	Shelby	0.062	0.062
181630013	Indiana	Vanderburgh	0.069	0.069
181630021	Indiana	Vanderburgh	0.070	0.070
181670018	Indiana	Vigo	0.065	0.065
181670024	Indiana	Vigo	0.061	0.061
181699991	Indiana	Wabash	0.068	0.068
181730008	Indiana	Warrick	0.068	0.068
181730009	Indiana	Warrick	0.066	0.066
181730011	Indiana	Warrick	0.067	0.067

8. Michigan

EPA has not recognized any change to the design values for monitors in Michigan even though many of them have been impacted by the May and July 2016 Exceptional Events. As is illustrated below, there are eight monitors highlighted in yellow that appear to have been influenced by these events. We urge EPA to recognize these improvements in design values. In the case of St. Clair (261470005), the monitor would be measuring attainment of the 2015 ozone NAAQS with recognition of these events.

AQS Site ID	State Name	County Name	EPA Accepted 2014-2106		No Fire 2014-2016 (ppm)	
			2014-2016 Design Value (ppm)			
			Design Value (ppm)			
260050003	Michigan	Allegan	0.075		0.075	
260190003	Michigan	Benzie	0.069		0.069	
260210014	Michigan	Berrien	0.074		0.074	
260270003	Michigan	Cass	0.070		0.070	
260330901	Michigan	Chippewa	0.059		0.059	
260370001	Michigan	Clinton	0.067		0.067	
260490021	Michigan	Genesee	0.068		0.068	
260492001	Michigan	Genesee	0.069		0.069	
260630007	Michigan	Huron	0.068		0.066	

260650012	Michigan	Ingham	0.067	0.067
260770008	Michigan	Kalamazoo	0.069	0.069
260810020	Michigan	Kent	0.069	0.069
260810022	Michigan	Kent	0.067	0.067
260910007	Michigan	Lenawee	0.067	0.067
260990009	Michigan	Macomb	0.072	0.072
260991003	Michigan	Macomb	0.067	0.067
261010922	Michigan	Manistee	0.068	0.068
261050007	Michigan	Mason	0.070	0.069
261130001	Michigan	Missaukee	0.067	0.066
261210039	Michigan	Muskegon	0.075	0.074
261250001	Michigan	Oakland	0.069	0.068
261390005	Michigan	Ottawa	0.070	0.070
261470005	Michigan	St. Clair	0.073	0.070
261530001	Michigan	Schoolcraft	0.070	0.070
261579991	Michigan	Tuscola	0.066	0.064
261610008	Michigan	Washtenaw	0.067	0.067
261619991	Michigan	Washtenaw	0.068	0.067
261630001	Michigan	Wayne	0.065	0.065
261630019	Michigan	Wayne	0.072	0.072
261630093	Michigan	Wayne		
261630094	Michigan	Wayne		
261659991	Michigan	Wexford	0.067	0.067

9. Ohio

EPA has not recognized any change to the design values for monitors in Ohio²⁵ even though Ohio has submitted an Exceptional Events demonstration for the May 2016 event and even though many of them have been impacted by the May and July 2016 Exceptional Events. As is illustrated below, there are 13 monitors highlighted in yellow that appear to have been influenced by these events. We urge EPA to recognize these improvements in design values. In the case of Butler (390170018) and Geauga (390550004) they would be measuring attainment of the 2015 ozone NAAQS with recognition of these events.

AQS Site	ID	State Name	County Name	EPA Accepted 2014-2106		No Fire 2014-2016 Design Value (ppm)
				2014-2016 Design Value (ppm)	(ppm)	
390030009		Ohio	Allen	0.066		0.065

25 https://www.epa.gov/sites/production/files/2017-12/documents/oh_120d_tsdfinal.pdf

390071001	Ohio	Ashtabula	0.070	0.070	0.070
390170004	Ohio	Butler	0.072	0.072	0.072
390170018	Ohio	Butler	0.071	0.071	0.070
390179991	Ohio	Butler	0.069	0.069	0.069
390230001	Ohio	Clark	0.069		0.069
390230003	Ohio	Clark	0.067		0.066
390250022	Ohio	Clermont	0.070	0.070	0.070
390271002	Ohio	Clinton	0.070	0.070	0.070
390350034	Ohio	Cuyahoga	0.069	0.069	0.069
390350060	Ohio	Cuyahoga	0.064	0.064	0.063
390350064	Ohio	Cuyahoga	0.064	0.064	0.063
390355002	Ohio	Cuyahoga	0.068	0.068	0.067
390410002	Ohio	Delaware	0.067	0.067	0.066
390479991	Ohio	Fayette	0.068	0.068	0.068
390490029	Ohio	Franklin	0.071	0.071	0.071
390490037	Ohio	Franklin	0.066	0.066	0.066
390490081	Ohio	Franklin	0.067	0.067	0.067
390550004	Ohio	Geauga	0.071	0.071	0.070
390570006	Ohio	Greene	0.068		0.068
390610006	Ohio	Hamilton	0.072	0.072	0.072
390610010	Ohio	Hamilton	0.072	0.072	0.072
390610040	Ohio	Hamilton	0.071	0.071	0.071
390810017	Ohio	Jefferson	0.065		0.065
390830002	Ohio	Knox	0.067	0.067	0.067
390850003	Ohio	Lake	0.075	0.075	0.073
390850007	Ohio	Lake	0.067	0.067	0.067
390870011	Ohio	Lawrence	0.064		0.064
390870012	Ohio	Lawrence	0.067		0.066
390890005	Ohio	Licking	0.067	0.067	0.067
390930018	Ohio	Lorain	0.066	0.066	0.065
390950024	Ohio	Lucas	0.067		0.066
390950027	Ohio	Lucas	0.064		0.064
390950034	Ohio	Lucas	0.064		0.063
390950035	Ohio	Lucas			
390970007	Ohio	Madison	0.068	0.068	0.068
390990013	Ohio	Mahoning	0.063		0.063
391030004	Ohio	Medina	0.064	0.064	0.064
391090005	Ohio	Miami	0.067		0.067
391130037	Ohio	Montgomery	0.070		0.070
391219991	Ohio	Noble	0.066		0.066
391331001	Ohio	Portage	0.061	0.061	0.061
391351001	Ohio	Preble	0.067		0.067
391510016	Ohio	Stark	0.069	0.069	0.069

391510022	Ohio	Stark	0.064	0.064	0.064
391514005	Ohio	Stark	0.066	0.066	0.065
391530020	Ohio	Summit	0.061	0.061	0.061
391550011	Ohio	Trumbull	0.068		0.068
391550013	Ohio	Trumbull			
391650007	Ohio	Warren	0.072	0.072	0.072
391670004	Ohio	Washington	0.065		0.065
391730003	Ohio	Wood	0.063		0.063

10. Pennsylvania

EPA has not recognized any change to the design values for monitors in Pennsylvania²⁶ even though Pennsylvania has submitted an Exceptional Events demonstration for the May 2016 event and even though many of them have been impacted by the May and July 2016 Exceptional Events. As is illustrated below, there are 33 monitors highlighted in yellow that appear to have been influenced by these events. We urge EPA to recognize these improvements in design values. In the case of Berks (420110011), Chester (420290100), Lebanon (420750100) and Montgomery (420910013) they would be brought into attainment with the 2015 ozone NAAQS with recognition of these events. Bucks (420170012) and Philadelphia (421010024) would be brought into attainment with the 2008 ozone NAAQS.

AQS Site ID	State Name	County Name	EPA Accepted 2014-2106		
			2014-2016 Design Value (ppm)	Design Value (ppm)	No Fire 2014-2016 Design Value (ppm)
420010001	Pennsylvania	Adams	0.058		0.057
420019991	Pennsylvania	Adams	0.067	0.067	0.066
420030008	Pennsylvania	Allegheny	0.067		0.067
420030067	Pennsylvania	Allegheny	0.068		0.068
420031008	Pennsylvania	Allegheny	0.070		0.070
420050001	Pennsylvania	Armstrong	0.070		0.068
420070002	Pennsylvania	Beaver	0.070		0.069
420070005	Pennsylvania	Beaver	0.068		0.068
420070014	Pennsylvania	Beaver	0.065		0.065
420110006	Pennsylvania	Berks	0.066	0.066	0.064
420110011	Pennsylvania	Berks	0.071	0.071	0.069
420130801	Pennsylvania	Blair	0.063		0.063
420150011	Pennsylvania	Bradford	0.056		0.055

26 https://www.epa.gov/sites/production/files/2017-12/documents/pa_120d_tsds_final.pdf

420170012	Pennsylvania	Bucks	0.077	0.077	0.075
420210011	Pennsylvania	Cambria	0.063		0.062
420270100	Pennsylvania	Centre	0.063		0.063
420279991	Pennsylvania	Centre	0.065		0.065
420290100	Pennsylvania	Chester	0.073	0.073	0.070
420334000	Pennsylvania	Clearfield	0.064		0.064
420430401	Pennsylvania	Dauphin	0.066	0.066	0.064
420431100	Pennsylvania	Dauphin	0.067	0.067	0.065
420450002	Pennsylvania	Delaware	0.072	0.072	0.072
420479991	Pennsylvania	Elk	0.066		0.064
420490003	Pennsylvania	Erie	0.066		0.065
420550001	Pennsylvania	Franklin	0.060	0.060	0.060
420590002	Pennsylvania	Greene	0.067		0.067
420630004	Pennsylvania	Indiana	0.070		0.069
420690101	Pennsylvania	Lackawanna	0.067		0.066
420692006	Pennsylvania	Lackawanna	0.064		0.064
420710007	Pennsylvania	Lancaster	0.069	0.069	0.067
420710012	Pennsylvania	Lancaster	0.066	0.066	0.064
420730015	Pennsylvania	Lawrence	0.068		0.067
420750100	Pennsylvania	Lebanon	0.071	0.071	0.069
420770004	Pennsylvania	Lehigh	0.070	0.070	0.068
420791101	Pennsylvania	Luzerne	0.064		0.064
420810100	Pennsylvania	Lycoming	0.064		0.063
420850100	Pennsylvania	Mercer	0.069		0.068
420859991	Pennsylvania	Mercer	0.065		0.064
420890002	Pennsylvania	Monroe	0.065	0.065	0.065
420910013	Pennsylvania	Montgomery	0.072	0.072	0.070
420950025	Pennsylvania	Northampton	0.070	0.070	0.068
420958000	Pennsylvania	Northampton	0.069	0.069	0.066
421010004	Pennsylvania	Philadelphia	0.061	0.061	0.059
421010024	Pennsylvania	Philadelphia	0.077	0.077	0.075
421010048	Pennsylvania	Philadelphia	0.074	0.074	0.072
421119991	Pennsylvania	Somerset	0.062		0.062
421174000	Pennsylvania	Tioga	0.063		0.061
421250005	Pennsylvania	Washington	0.068		0.068
421250200	Pennsylvania	Washington	0.065		0.065
421255001	Pennsylvania	Washington	0.068		0.067
421290008	Pennsylvania	Westmoreland	0.068		0.068
421330008	Pennsylvania	York	0.066	0.066	0.066
421330011	Pennsylvania	York	0.070		0.067

11. Wisconsin

EPA has not recognized any change to the design values for monitors in Wisconsin²⁷ even though the Sheboygan (551170006) monitor highlighted in yellow appears to have been influenced by the May and July 2016 Exceptional Events. This is particularly significant because Sheboygan (551170006) is measuring the highest ozone concentration of any of the Wisconsin monitors. We urge EPA to recognize this improvement in design value.

AQS Site ID	State Name	County Name	2014-2016 Design Value (ppm)	EPA Accepted 2014-2106		No Fire 2014-2016 Design Value (ppm)
				Design Value (ppm)	(ppm)	
550030010	Wisconsin	Ashland	0.058			0.058
550090026	Wisconsin	Brown	0.066			0.066
550210015	Wisconsin	Columbia	0.067			0.067
550250041	Wisconsin	Dane	0.065			0.065
550270001	Wisconsin	Dodge	0.068	0.068		0.068
550290004	Wisconsin	Door	0.072	0.072		0.072
550350014	Wisconsin	Eau Claire	0.061			0.061
550390006	Wisconsin	Fond du Lac	0.066			0.066
550410007	Wisconsin	Forest	0.063			0.063
550550009	Wisconsin	Jefferson	0.069	0.069		0.069
550590019	Wisconsin	Kenosha	0.077			0.077
550590025	Wisconsin	Kenosha	0.071			0.071
550610002	Wisconsin	Kewaunee	0.069			0.069
550630012	Wisconsin	La Crosse	0.062			0.062
550710007	Wisconsin	Manitowoc	0.072	0.072		0.072
550730012	Wisconsin	Marathon	0.065			0.065
550790010	Wisconsin	Milwaukee	0.064	0.064		0.064
550790026	Wisconsin	Milwaukee	0.068	0.068		0.068
550790085	Wisconsin	Milwaukee	0.071	0.071		0.071
550870009	Wisconsin	Outagamie	0.067			0.067
550890008	Wisconsin	Ozaukee	0.071	0.071		0.071
550890009	Wisconsin	Ozaukee	0.073	0.073		0.073
551010020	Wisconsin	Racine				
551050030	Wisconsin	Rock	0.069			0.069
551110007	Wisconsin	Sauk	0.064			0.064
551170006	Wisconsin	Sheboygan	0.079	0.079		0.078
551170009	Wisconsin	Sheboygan	0.069	0.069		0.069

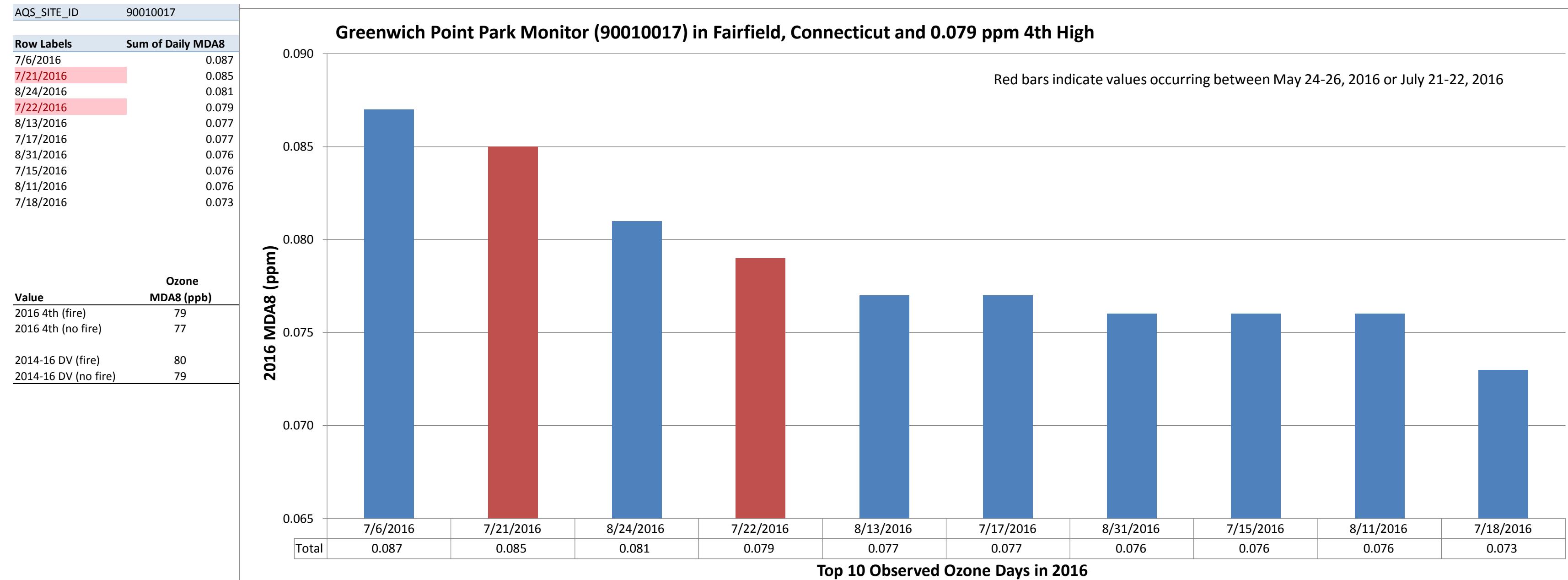
27 https://www.epa.gov/sites/production/files/2017-12/documents/wi_120d_tsd_rewrite_final.pdf

551199991	Wisconsin	Taylor	0.061	0.061
551250001	Wisconsin	Vilas	0.061	0.061
551270005	Wisconsin	Walworth	0.070	0.070
551330027	Wisconsin	Waukesha	0.066	0.066

Conclusion.

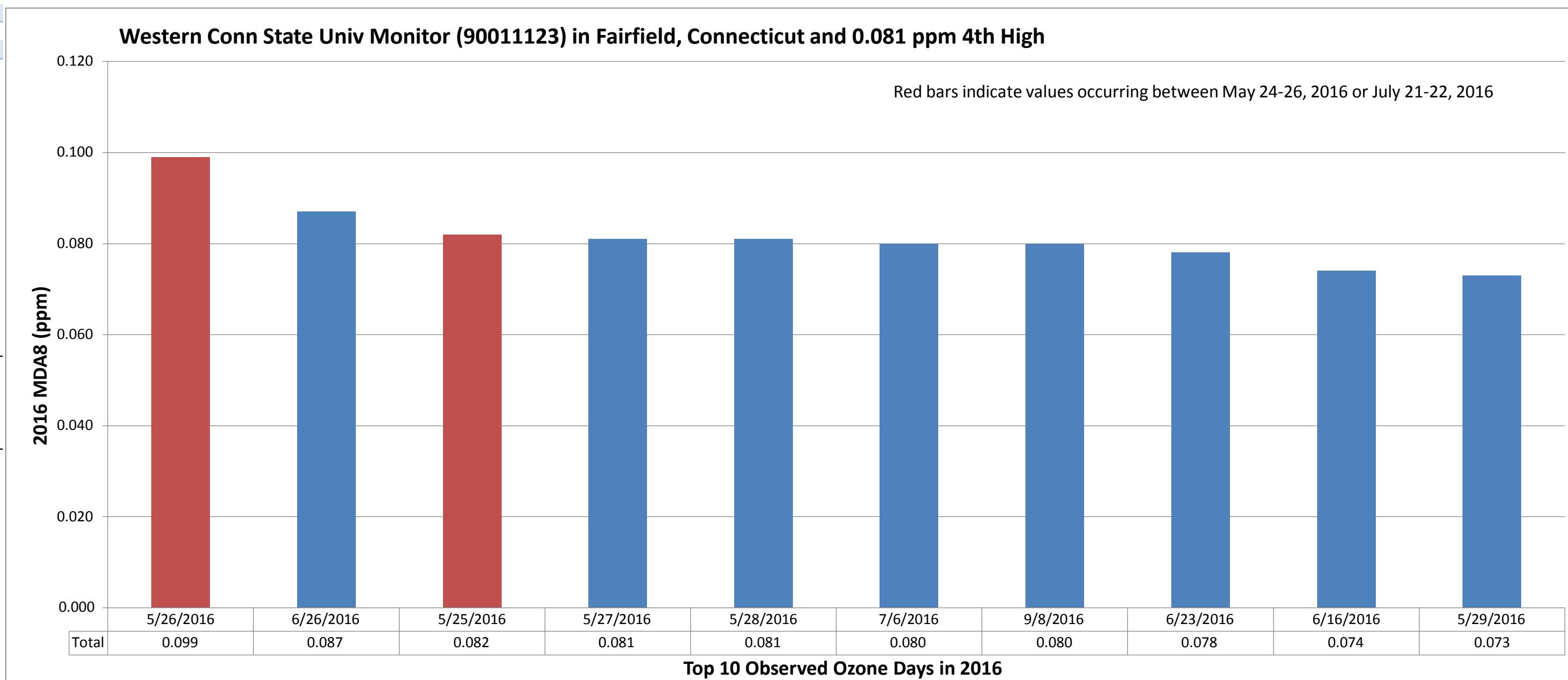
The Midwest Ozone Group appreciates the opportunity to offer these comments. Resolving this matter now is therefore important not only in making correct nonattainment designation decisions but also having a correct basis for conducting future year modeling, development of Good Neighbor SIP's and managing future ozone planning.

EXHIBIT A



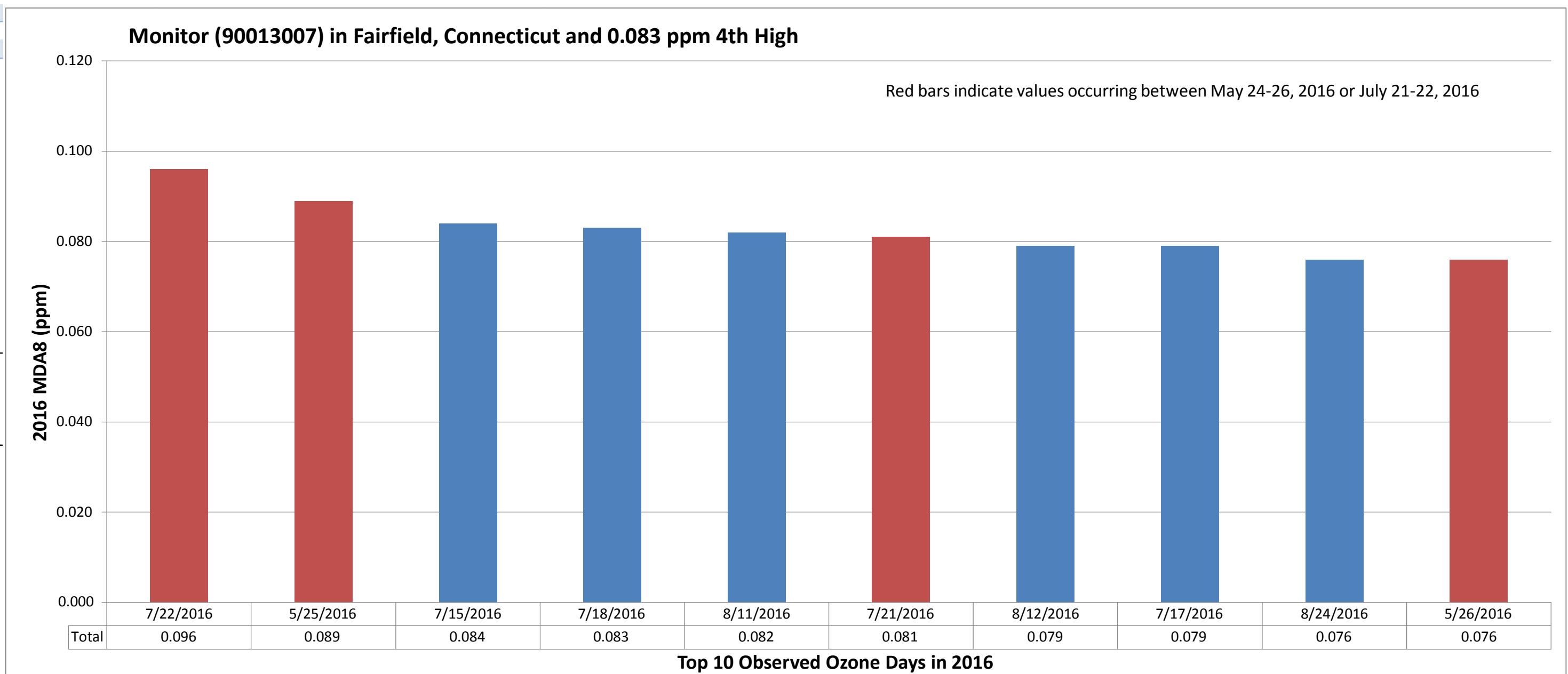
AQS_SITE_ID	90011123
Row Labels	Sum of Daily MDA8
5/26/2016	0.099
6/26/2016	0.087
5/25/2016	0.082
5/27/2016	0.081
5/28/2016	0.081
7/6/2016	0.080
9/8/2016	0.080
6/23/2016	0.078
6/16/2016	0.074
5/29/2016	0.073

Value	Ozone MDA8 (ppb)
2016 4th (fire)	81
2016 4th (no fire)	80
2014-16 DV (fire)	78
2014-16 DV (no fire)	77



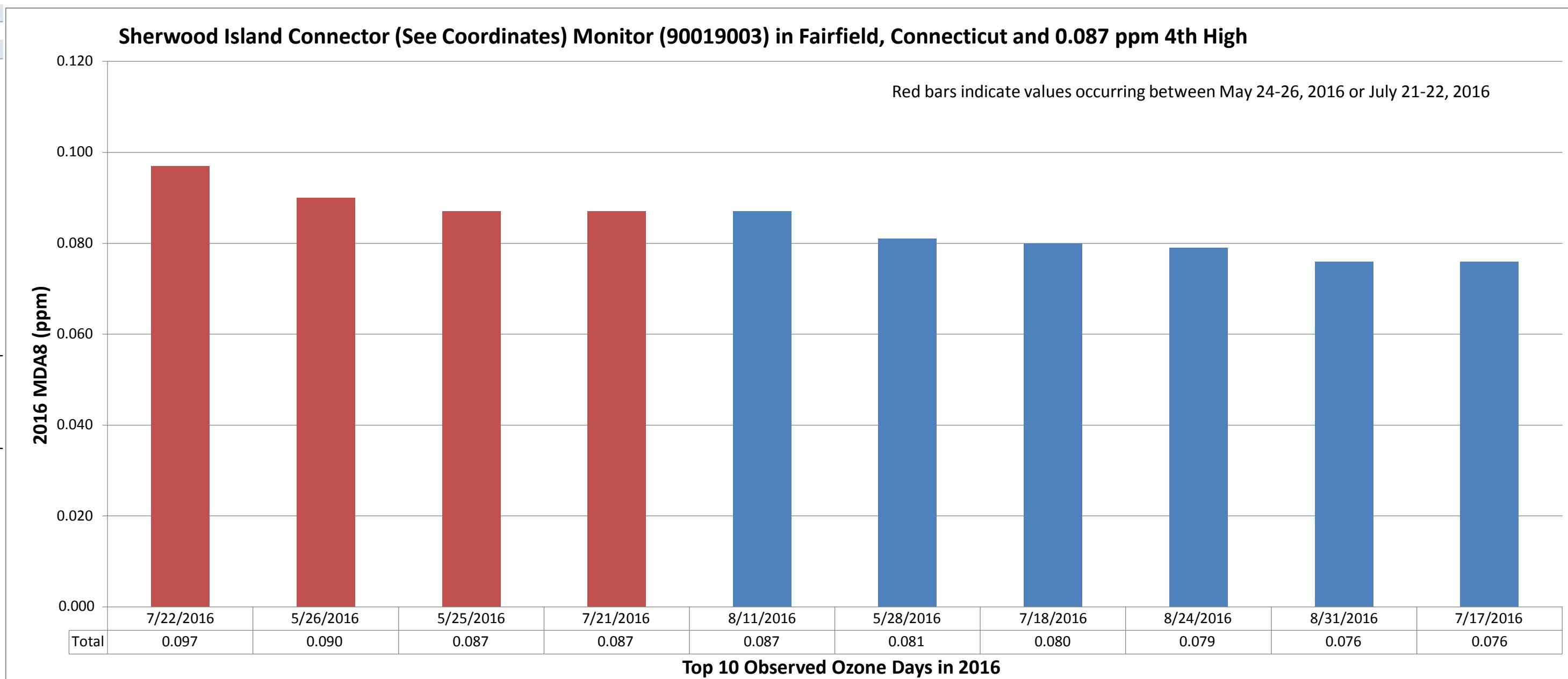
AQS_SITE_ID	90013007
Row Labels	Sum of Daily MDA8
7/22/2016	0.096
5/25/2016	0.089
7/15/2016	0.084
7/18/2016	0.083
8/11/2016	0.082
7/21/2016	0.081
8/12/2016	0.079
7/17/2016	0.079
8/24/2016	0.076
5/26/2016	0.076

Value	Ozone MDA8 (ppb)
2016 4th (fire)	83
2016 4th (no fire)	79
2014-16 DV (fire)	81
2014-16 DV (no fire)	79



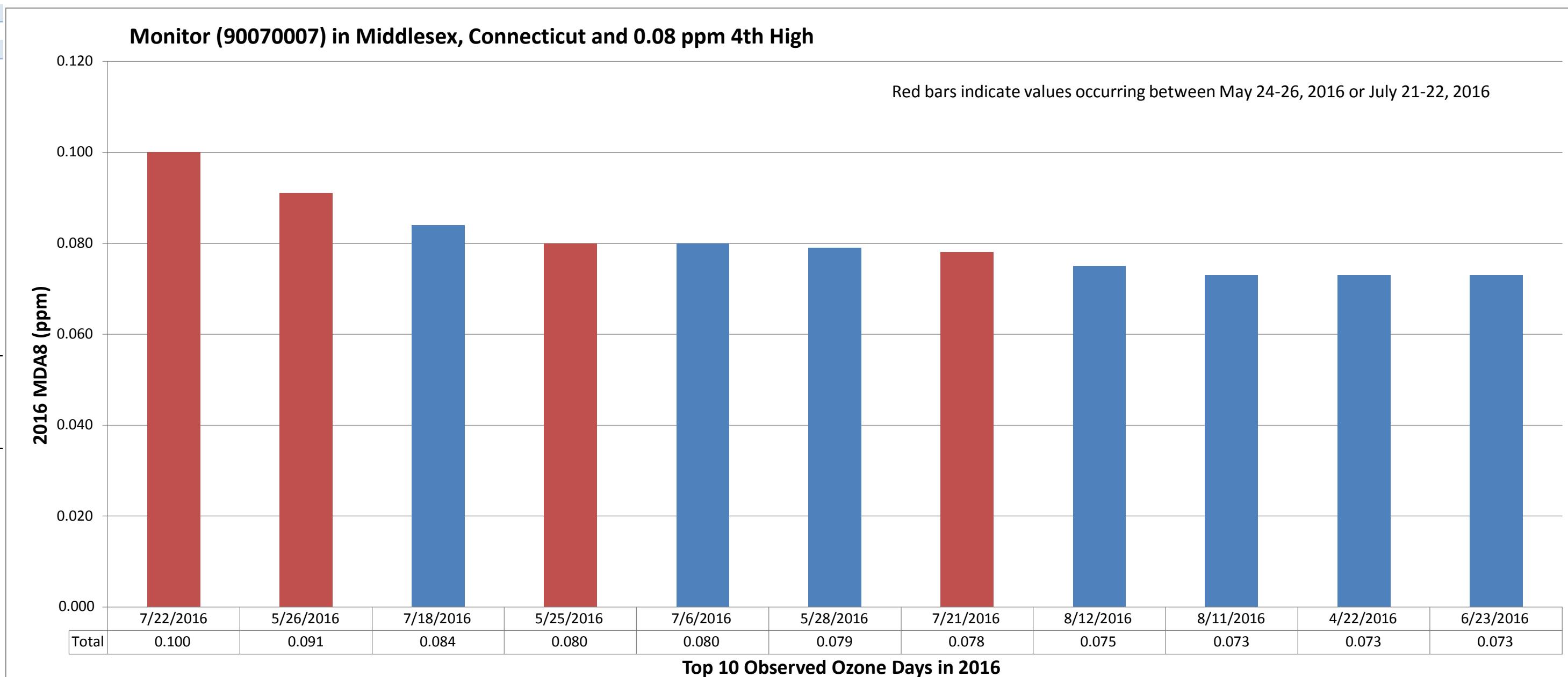
AQS_SITE_ID	90019003
Row Labels	Sum of Daily MDA8
7/22/2016	0.097
5/26/2016	0.090
5/25/2016	0.087
7/21/2016	0.087
8/11/2016	0.087
5/28/2016	0.081
7/18/2016	0.080
8/24/2016	0.079
8/31/2016	0.076
7/17/2016	0.076

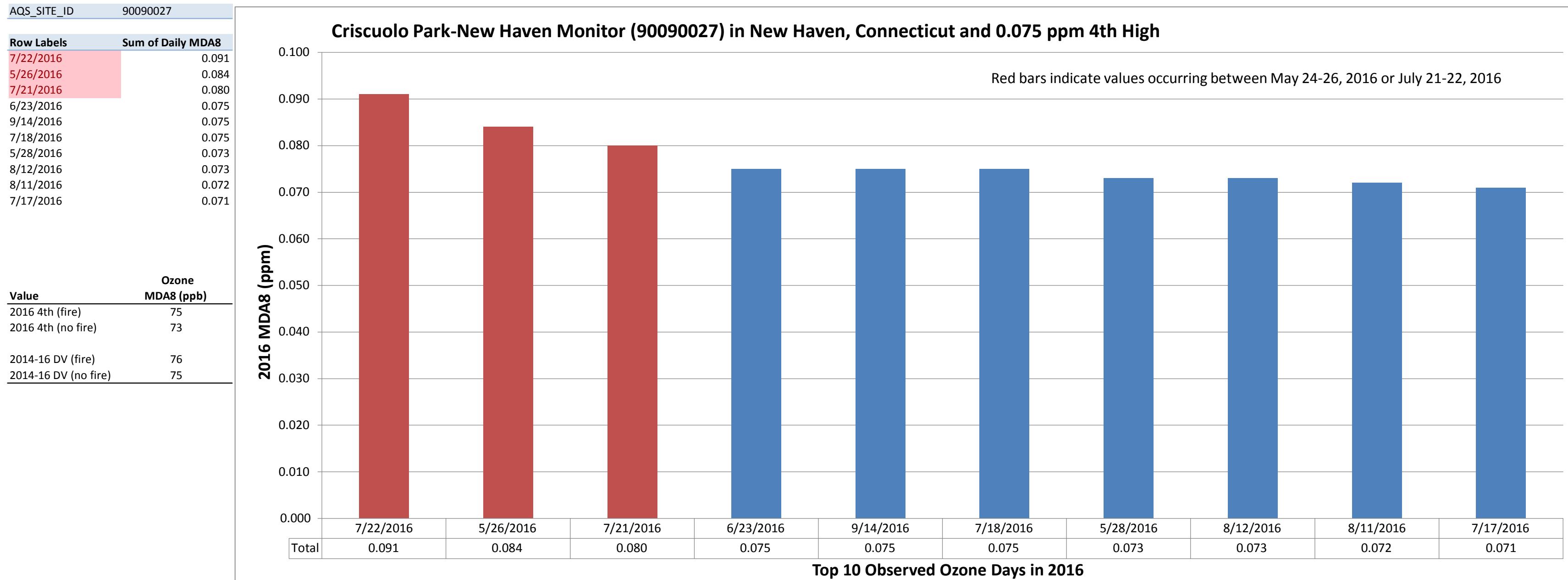
Value	Ozone MDA8 (ppb)
2016 4th (fire)	87
2016 4th (no fire)	79
2014-16 DV (fire)	85
2014-16 DV (no fire)	82



AQS_SITE_ID	90070007
Row Labels	Sum of Daily MDA8
7/22/2016	0.100
5/26/2016	0.091
7/18/2016	0.084
5/25/2016	0.080
7/6/2016	0.080
5/28/2016	0.079
7/21/2016	0.078
8/12/2016	0.075
8/11/2016	0.073
4/22/2016	0.073
6/23/2016	0.073

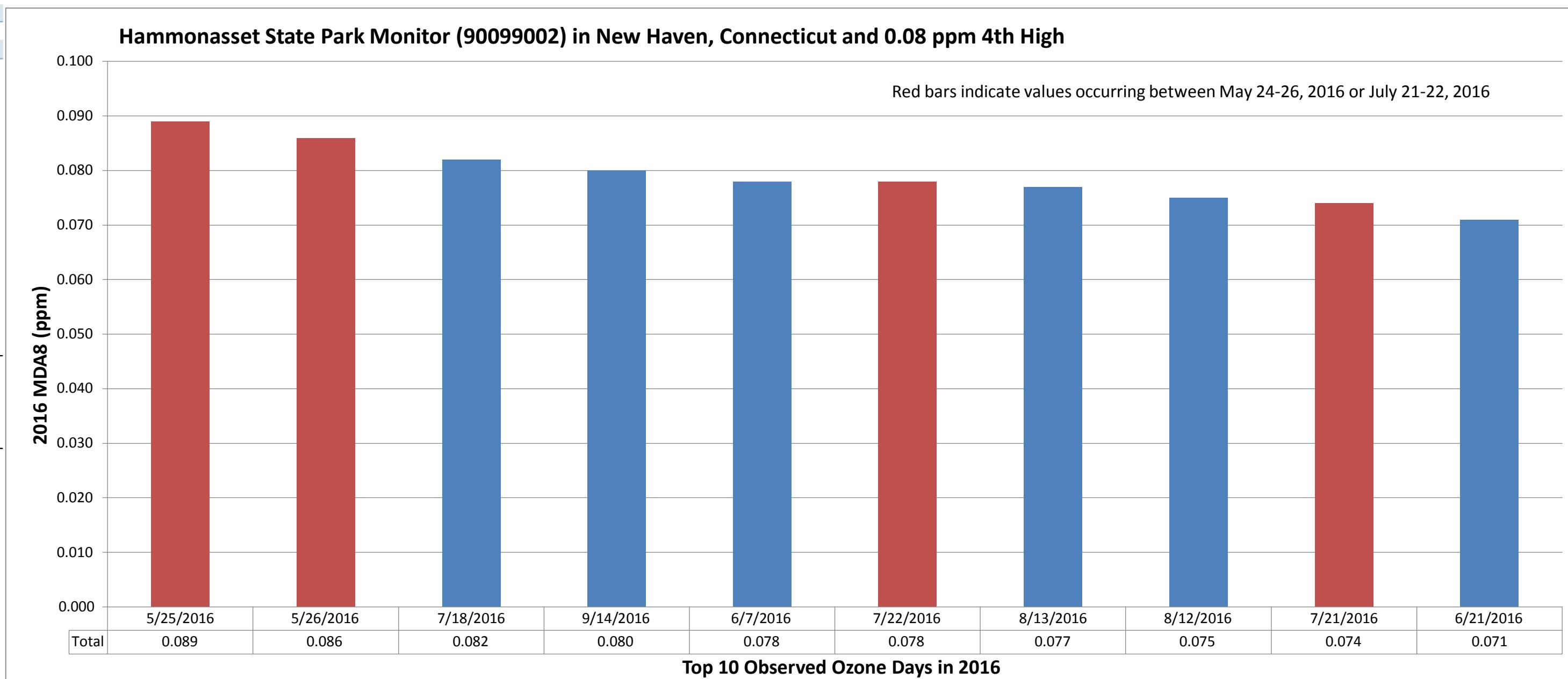
Value	Ozone MDA8 (ppb)
2016 4th (fire)	80
2016 4th (no fire)	75
2014-16 DV (fire)	79
2014-16 DV (no fire)	77





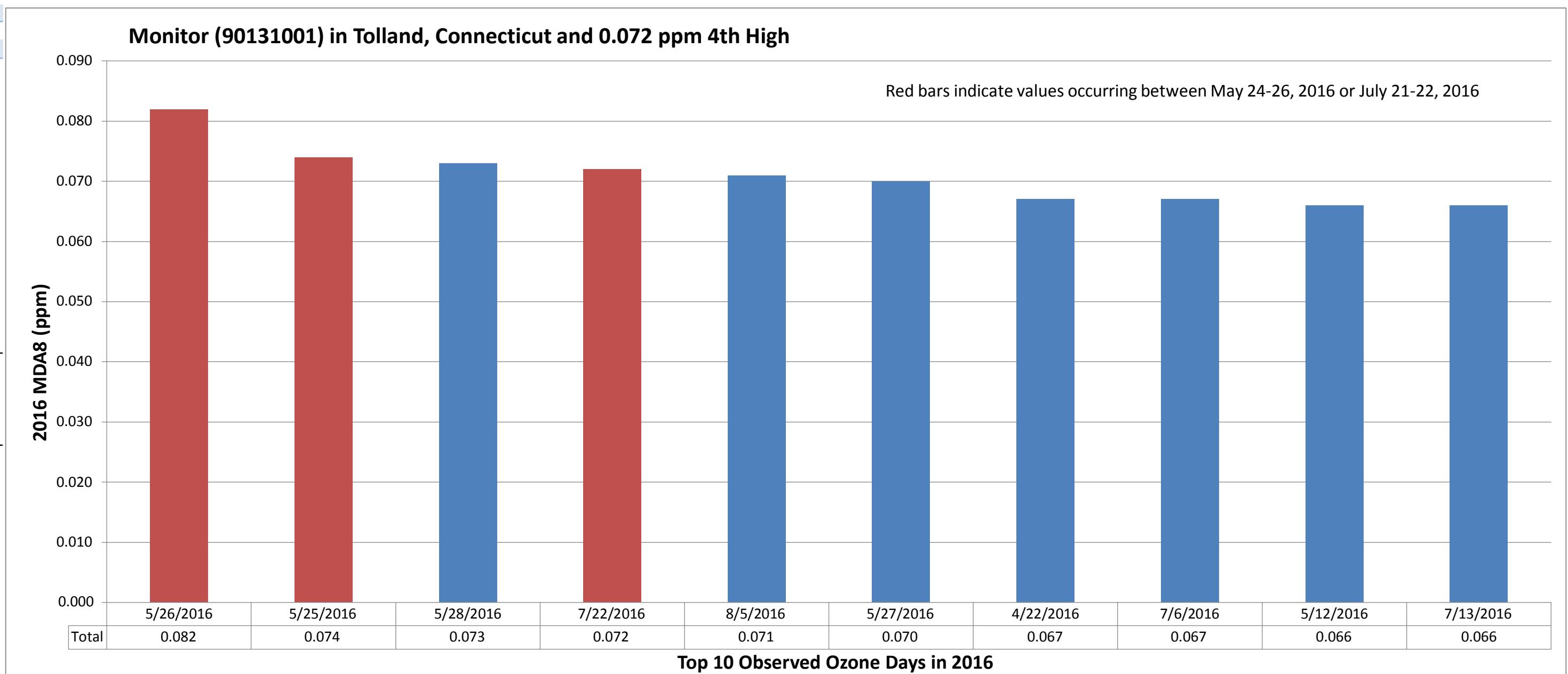
AQS_SITE_ID	90099002
Row Labels	Sum of Daily MDA8
5/25/2016	0.089
5/26/2016	0.086
7/18/2016	0.082
9/14/2016	0.080
6/7/2016	0.078
7/22/2016	0.078
8/13/2016	0.077
8/12/2016	0.075
7/21/2016	0.074
6/21/2016	0.071

Value	Ozone MDA8 (ppb)
2016 4th (fire)	80
2016 4th (no fire)	77
2014-16 DV (fire)	76
2014-16 DV (no fire)	75



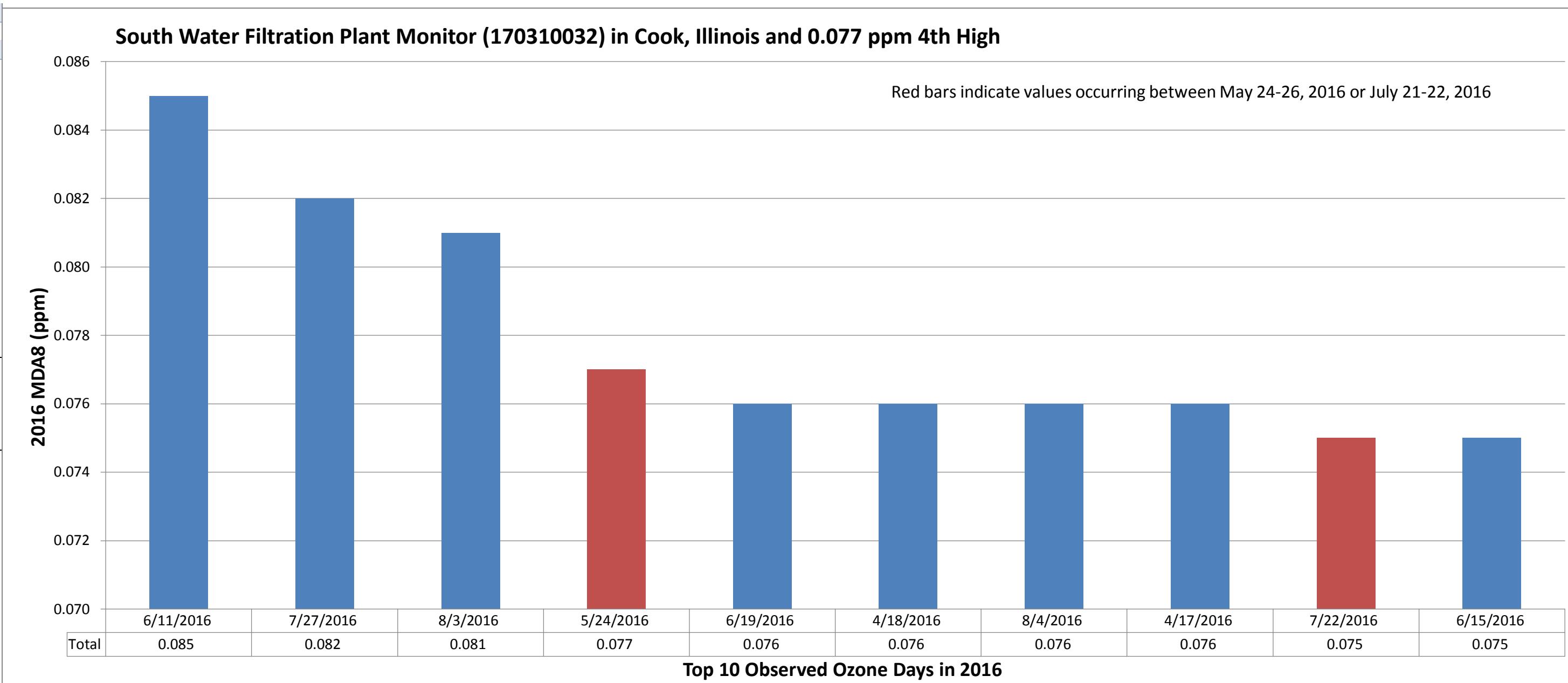
AQS_SITE_ID	90131001
Row Labels	Sum of Daily MDA8
5/26/2016	0.082
5/25/2016	0.074
5/28/2016	0.073
7/22/2016	0.072
8/5/2016	0.071
5/27/2016	0.070
4/22/2016	0.067
7/6/2016	0.067
5/12/2016	0.066
7/13/2016	0.066

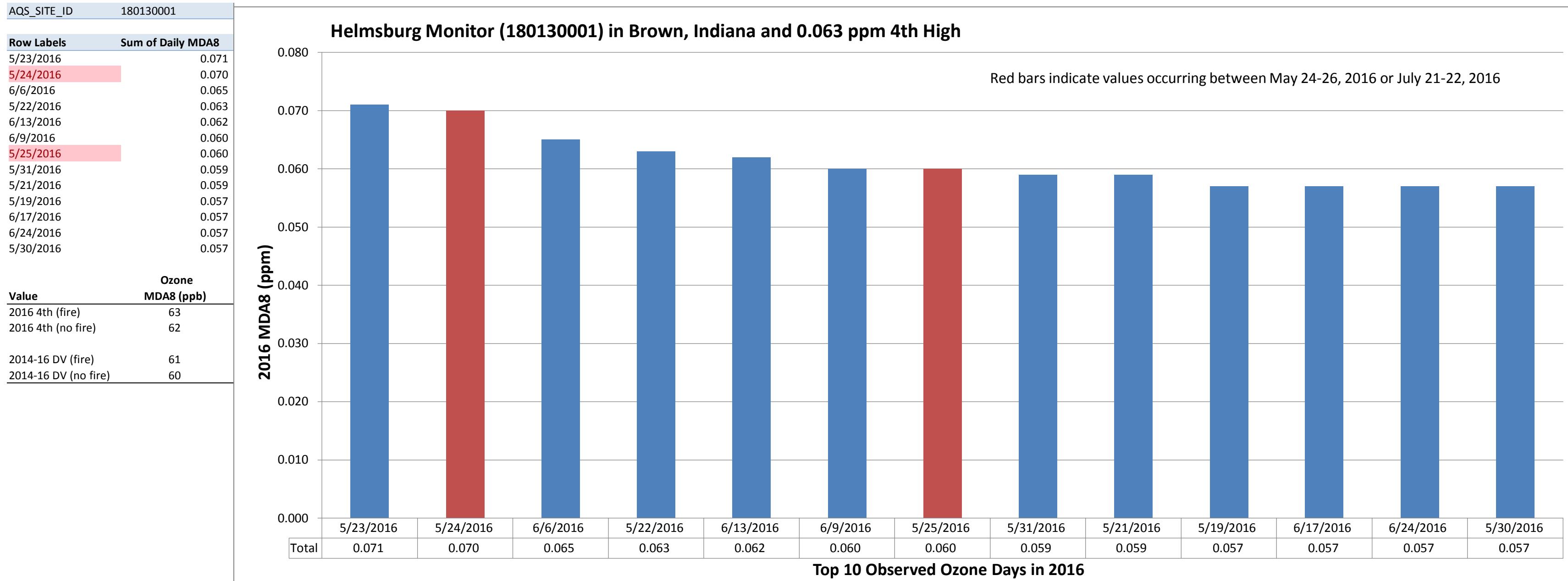
Value	Ozone MDA8 (ppb)
2016 4th (fire)	72
2016 4th (no fire)	67
2014-16 DV (fire)	73
2014-16 DV (no fire)	72

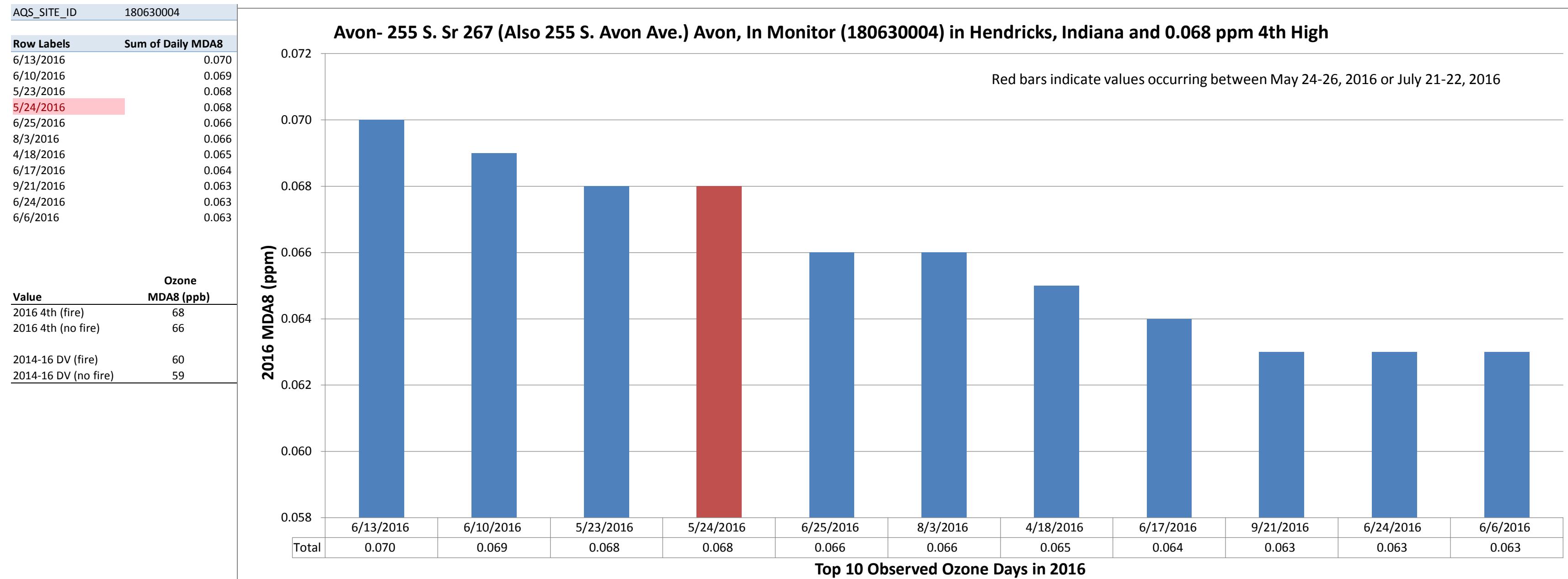


AQS_SITE_ID	170310032
Row Labels	Sum of Daily MDA8
6/11/2016	0.085
7/27/2016	0.082
8/3/2016	0.081
5/24/2016	0.077
6/19/2016	0.076
4/18/2016	0.076
8/4/2016	0.076
4/17/2016	0.076
7/22/2016	0.075
6/15/2016	0.075

Value	Ozone MDA8 (ppb)
2016 4th (fire)	77
2016 4th (no fire)	76
2014-16 DV (fire)	70
2014-16 DV (no fire)	69

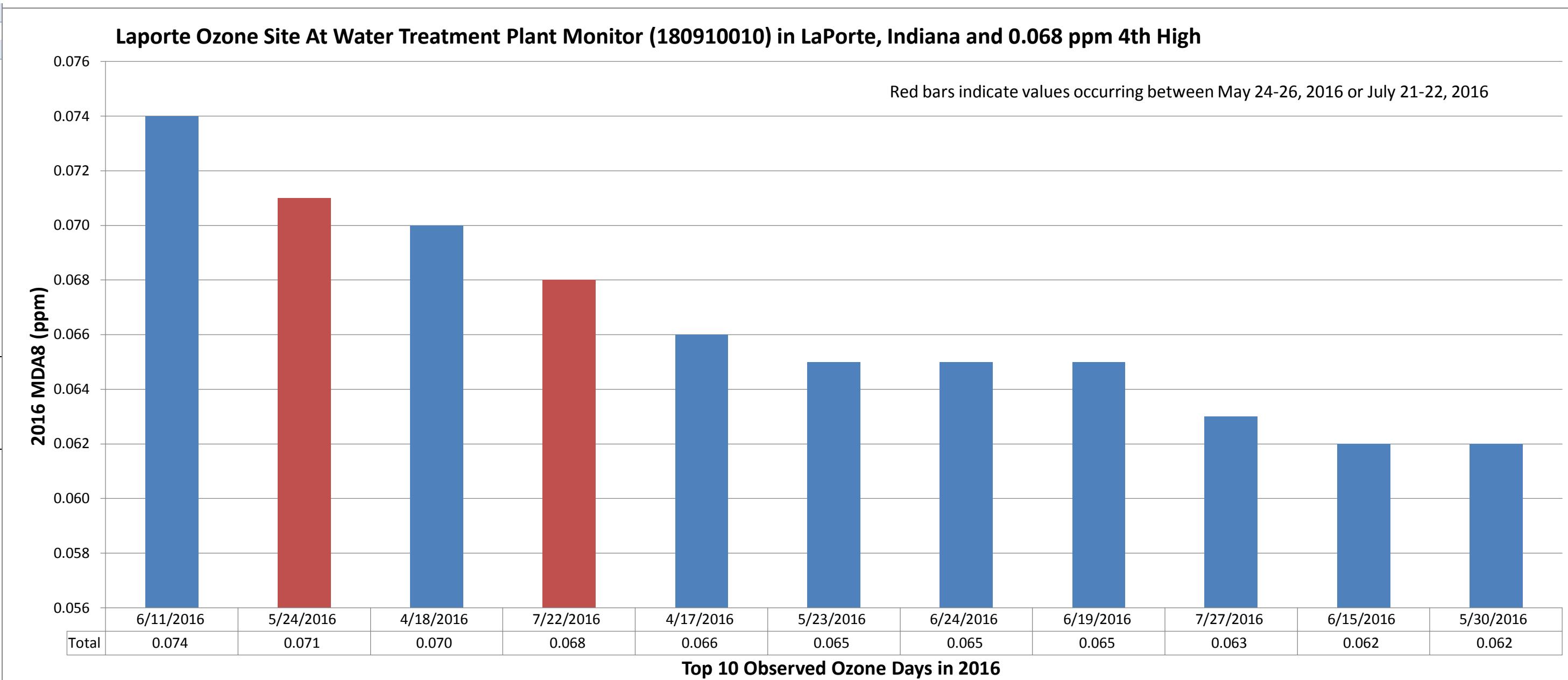


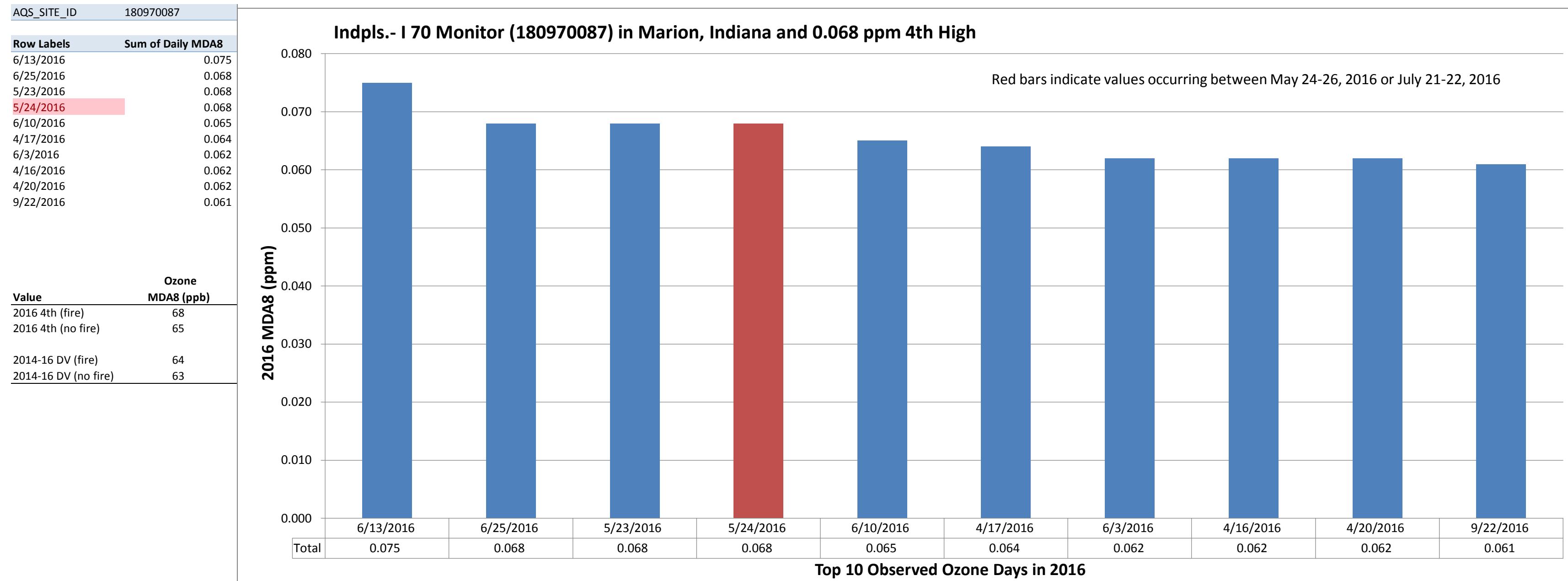


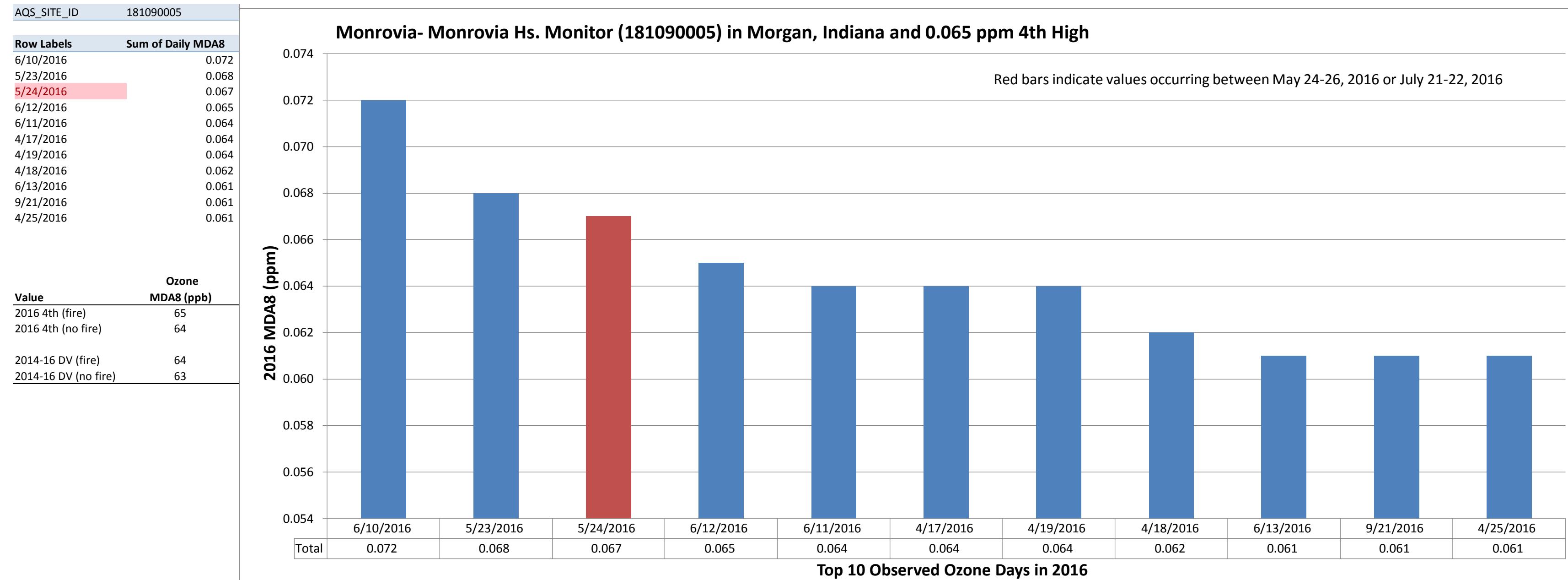


AQS_SITE_ID	180910010
Row Labels	Sum of Daily MDA8
6/11/2016	0.074
5/24/2016	0.071
4/18/2016	0.070
7/22/2016	0.068
4/17/2016	0.066
5/23/2016	0.065
6/24/2016	0.065
6/19/2016	0.065
7/27/2016	0.063
6/15/2016	0.062
5/30/2016	0.062

Value	Ozone MDA8 (ppb)
2016 4th (fire)	68
2016 4th (no fire)	65
2014-16 DV (fire)	63
2014-16 DV (no fire)	62

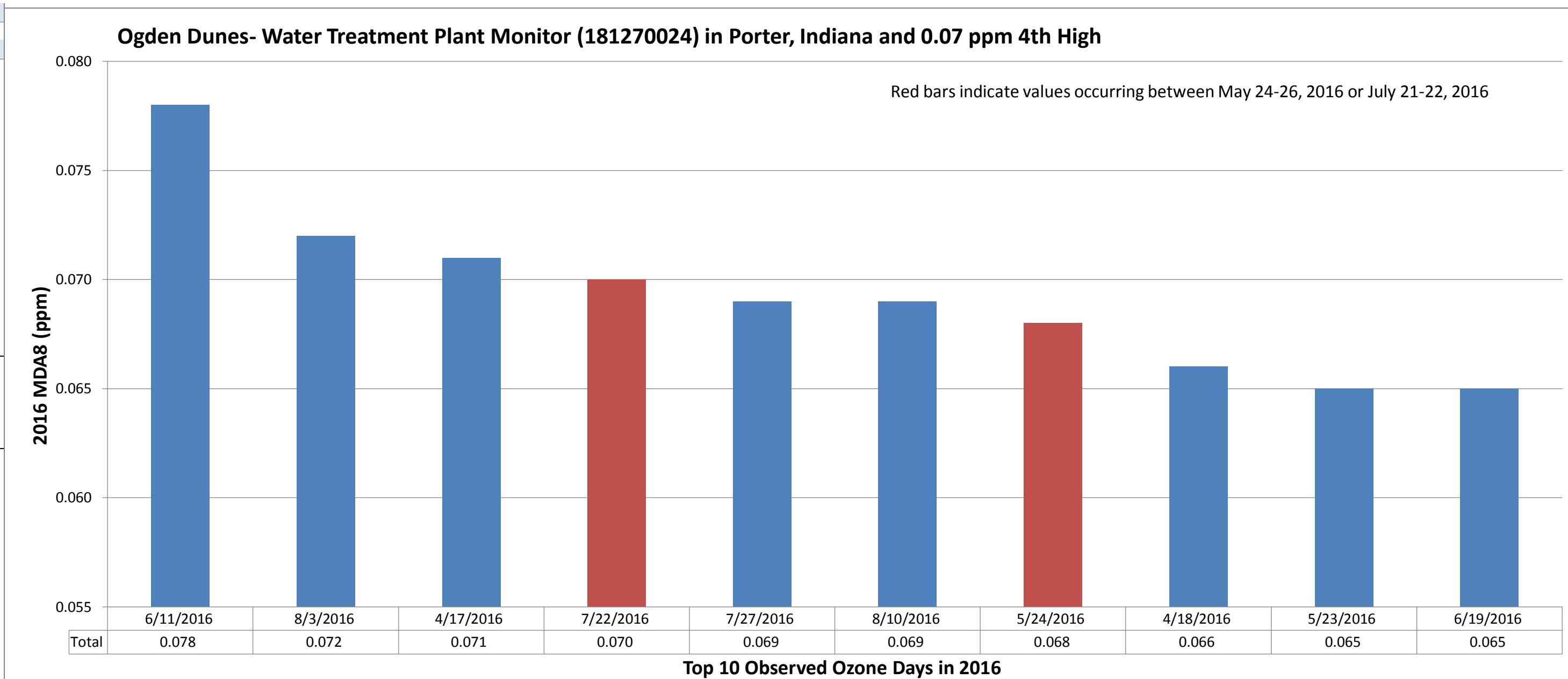






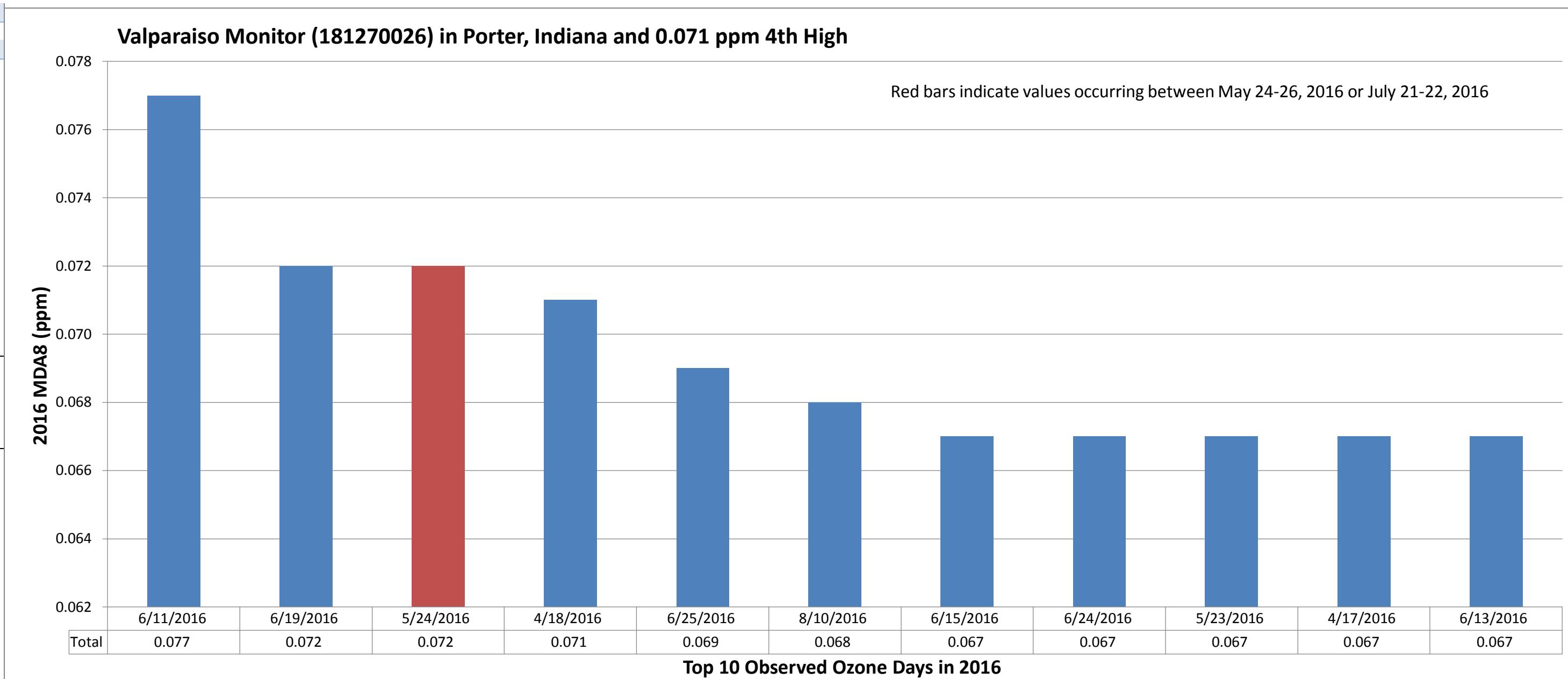
AQS_SITE_ID	181270024
Row Labels	Sum of Daily MDA8
6/11/2016	0.078
8/3/2016	0.072
4/17/2016	0.071
7/22/2016	0.070
7/27/2016	0.069
8/10/2016	0.069
5/24/2016	0.068
4/18/2016	0.066
5/23/2016	0.065
6/19/2016	0.065

Value	Ozone MDA8 (ppb)
2016 4th (fire)	70
2016 4th (no fire)	69
2014-16 DV (fire)	69
2014-16 DV (no fire)	68



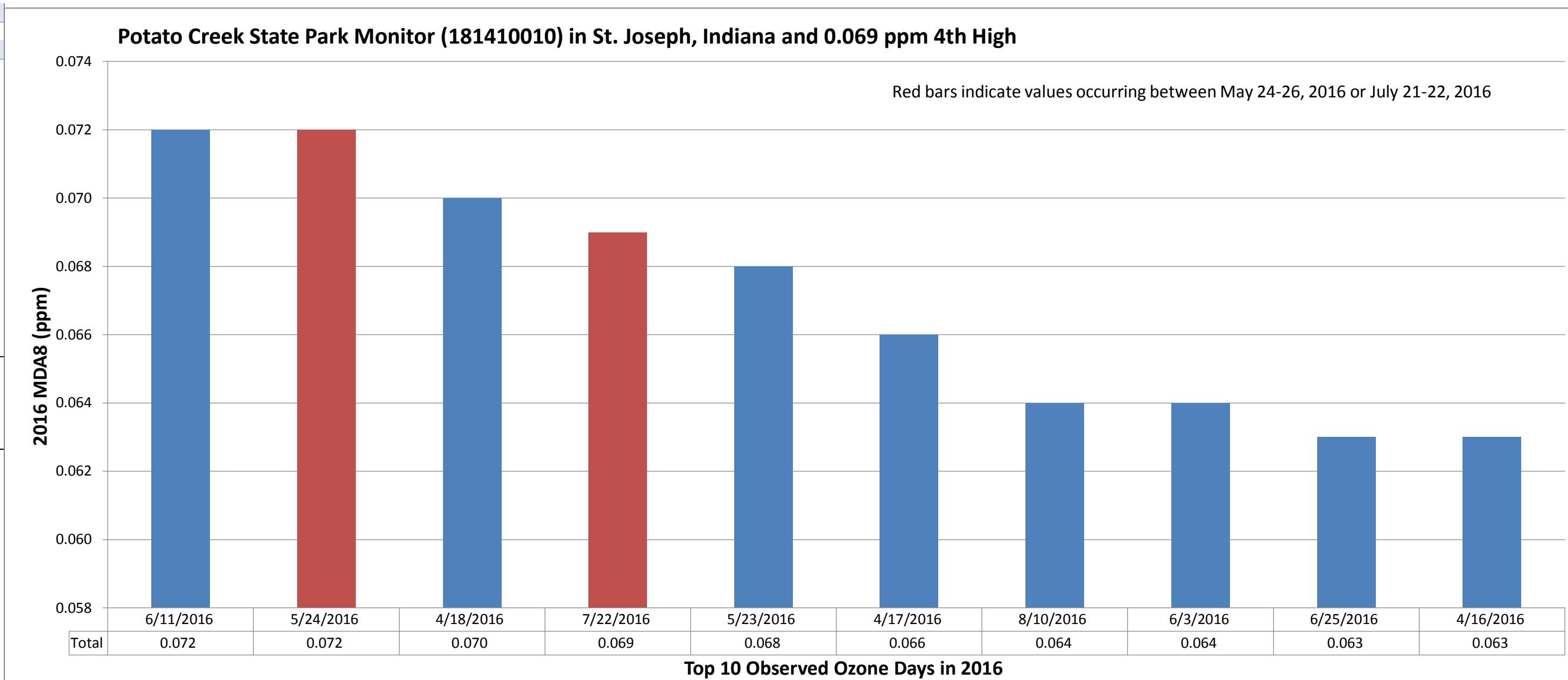
AQS_SITE_ID	181270026
Row Labels	Sum of Daily MDA8
6/11/2016	0.077
6/19/2016	0.072
5/24/2016	0.072
4/18/2016	0.071
6/25/2016	0.069
8/10/2016	0.068
6/15/2016	0.067
6/24/2016	0.067
5/23/2016	0.067
4/17/2016	0.067
6/13/2016	0.067

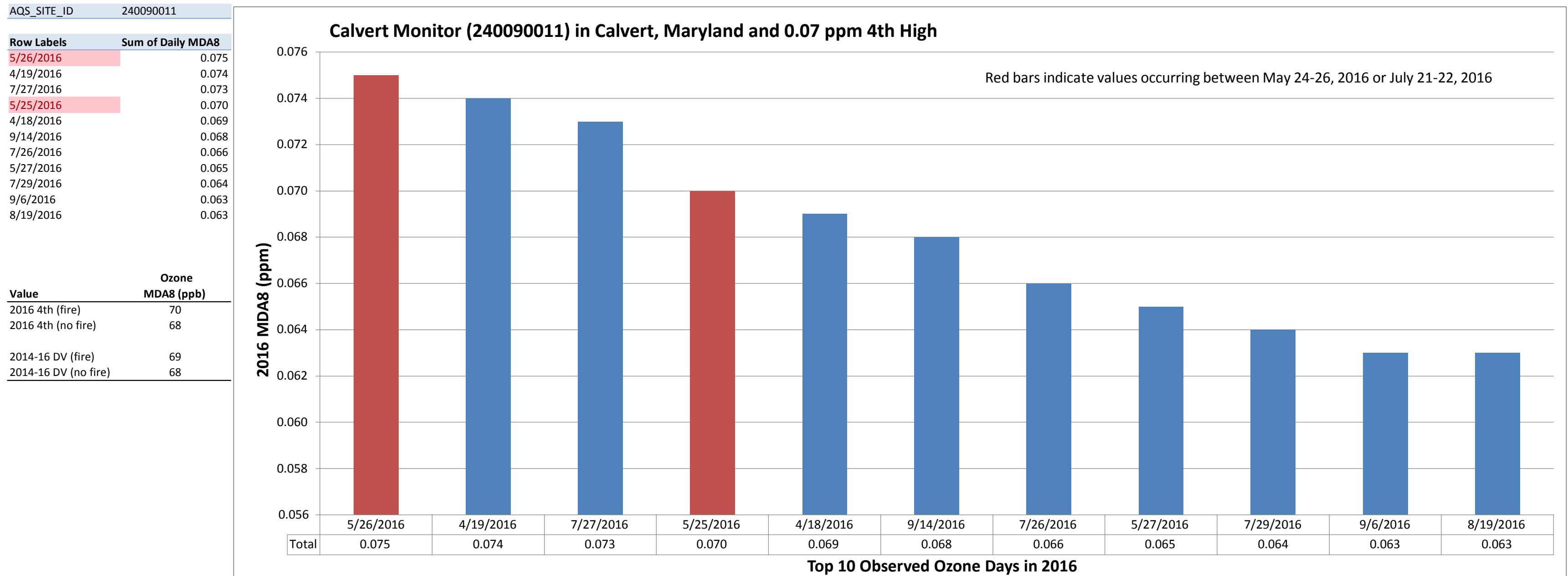
Value	Ozone MDA8 (ppb)
2016 4th (fire)	71
2016 4th (no fire)	69
2014-16 DV (fire)	66
2014-16 DV (no fire)	65

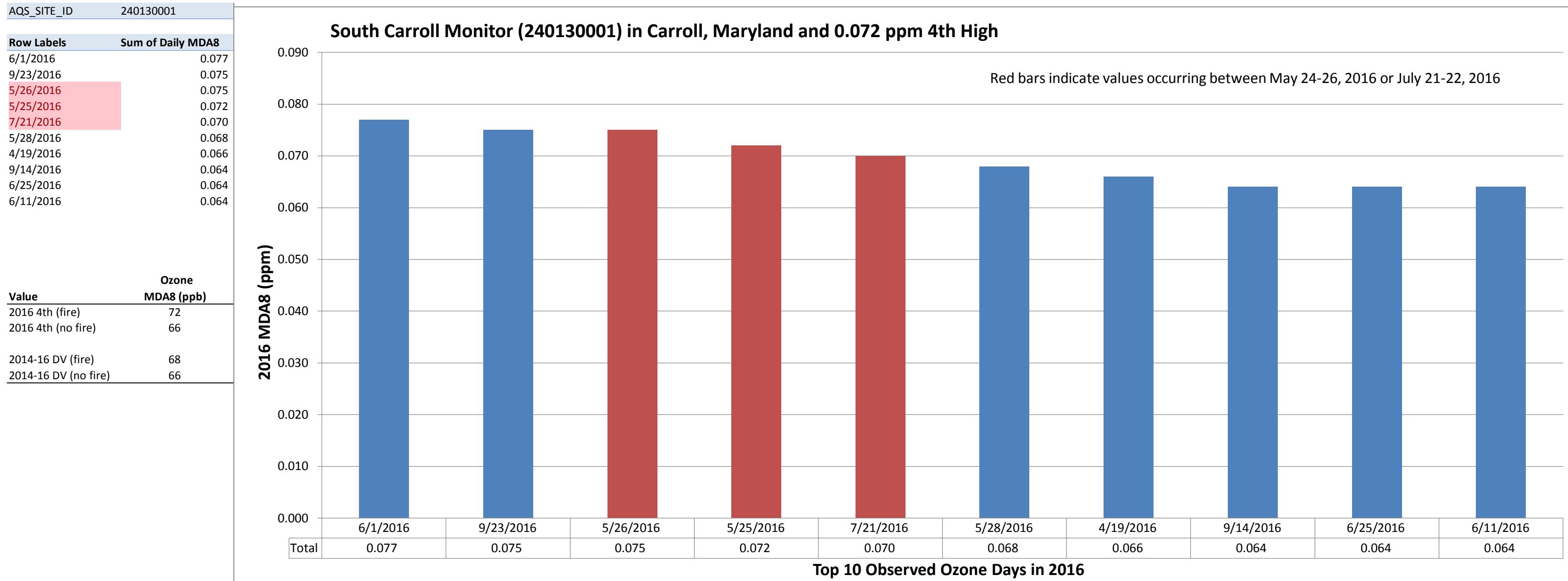


AQS_SITE_ID	181410010
Row Labels	Sum of Daily MDA8
6/11/2016	0.072
5/24/2016	0.072
4/18/2016	0.070
7/22/2016	0.069
5/23/2016	0.068
4/17/2016	0.066
8/10/2016	0.064
6/3/2016	0.064
6/25/2016	0.063
4/16/2016	0.063

Value	Ozone MDA8 (ppb)
2016 4th (fire)	69
2016 4th (no fire)	66
2014-16 DV (fire)	62
2014-16 DV (no fire)	61

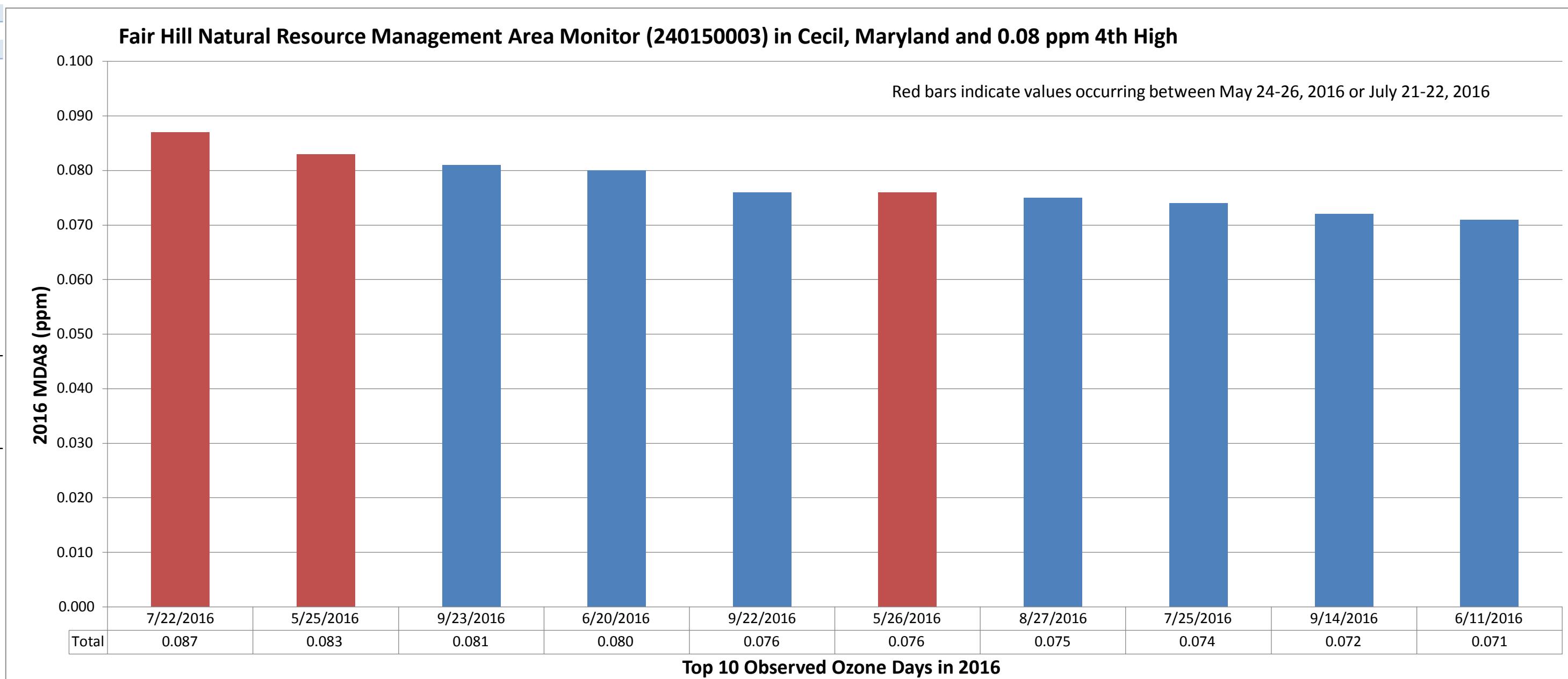


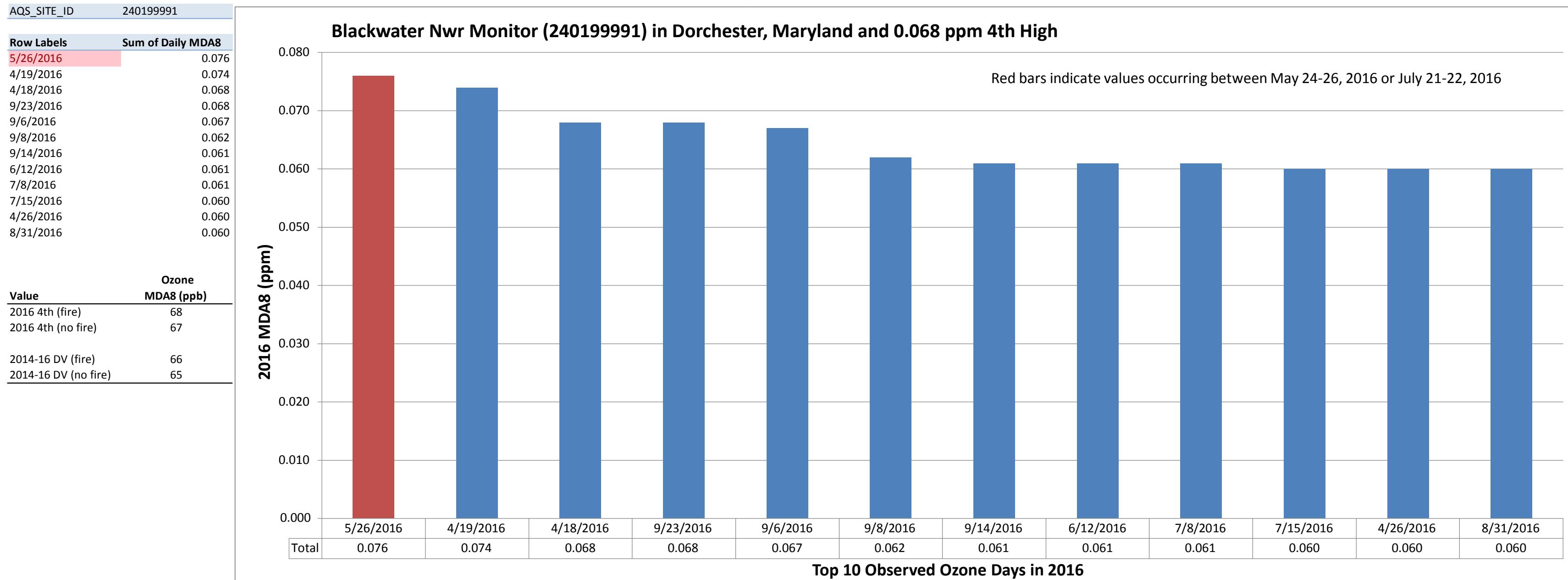


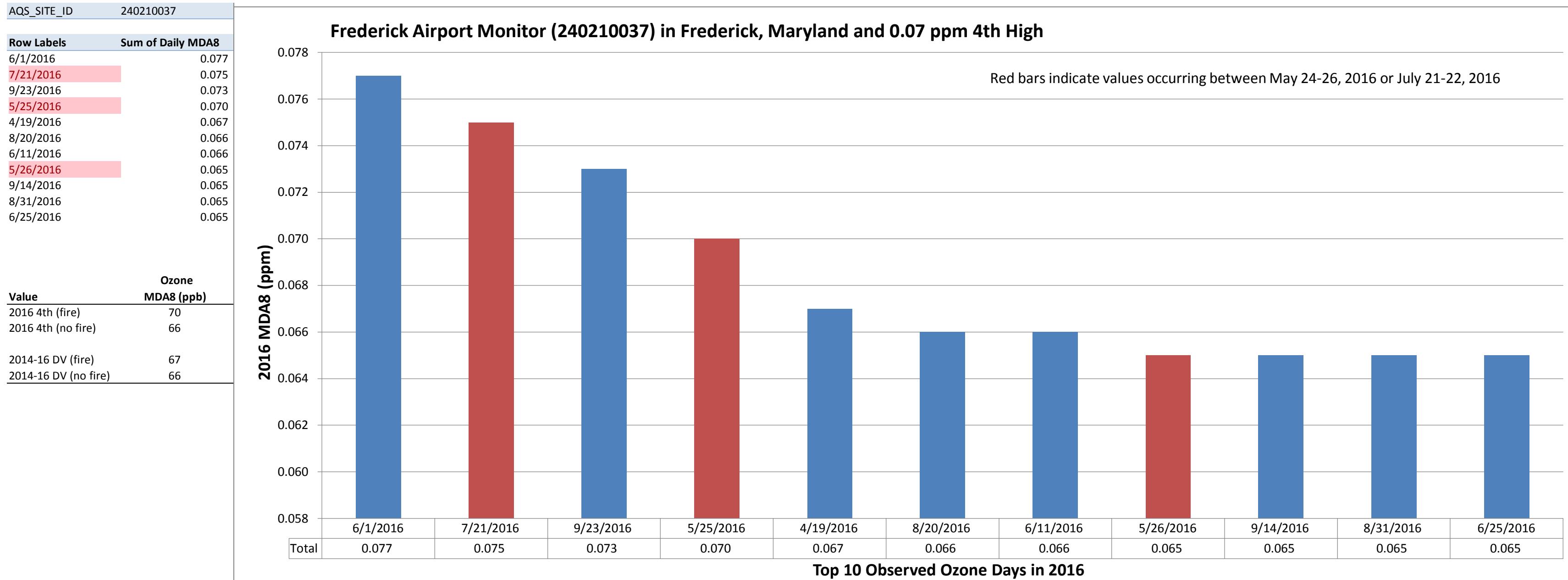


AQS_SITE_ID	240150003
Row Labels	Sum of Daily MDA8
7/22/2016	0.087
5/25/2016	0.083
9/23/2016	0.081
6/20/2016	0.080
9/22/2016	0.076
5/26/2016	0.076
8/27/2016	0.075
7/25/2016	0.074
9/14/2016	0.072
6/11/2016	0.071

Value	Ozone MDA8 (ppb)
2016 4th (fire)	80
2016 4th (no fire)	75
2014-16 DV (fire)	76
2014-16 DV (no fire)	74

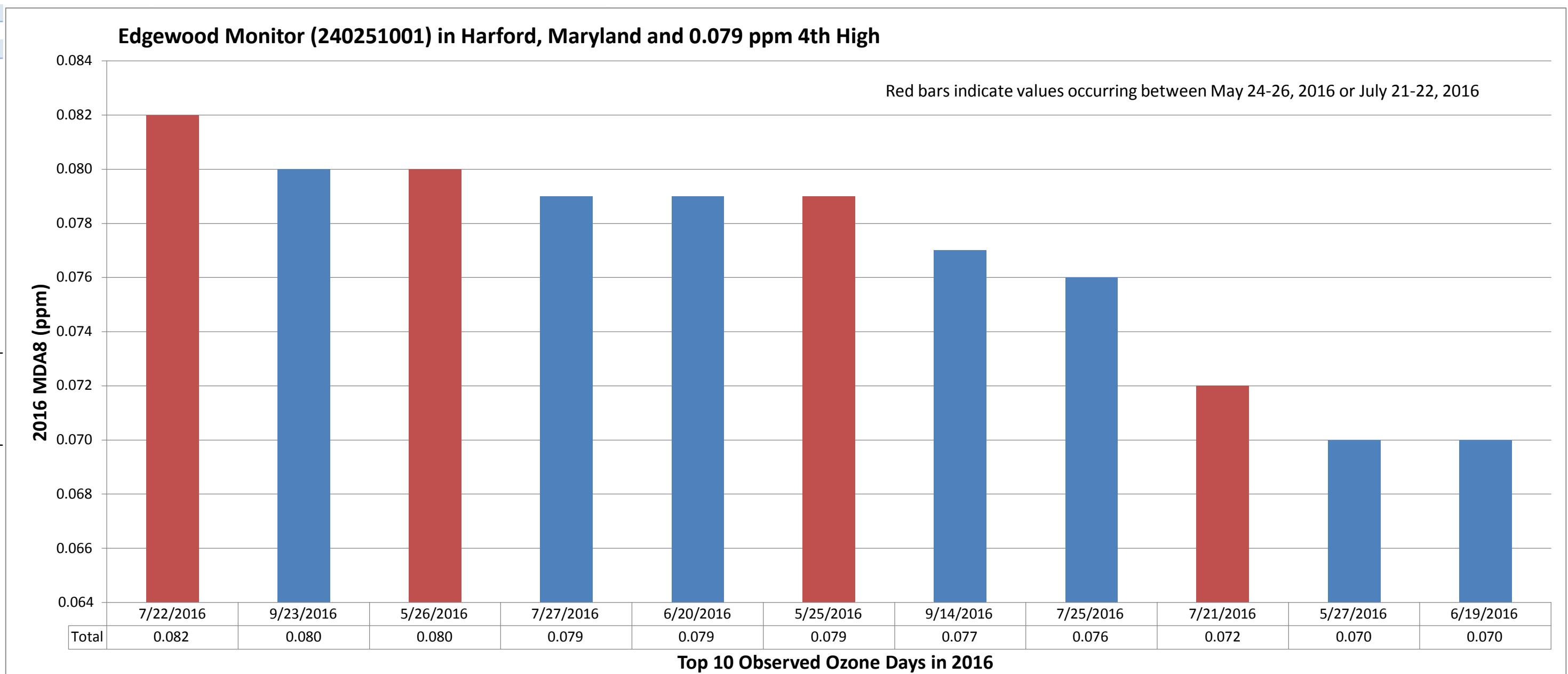






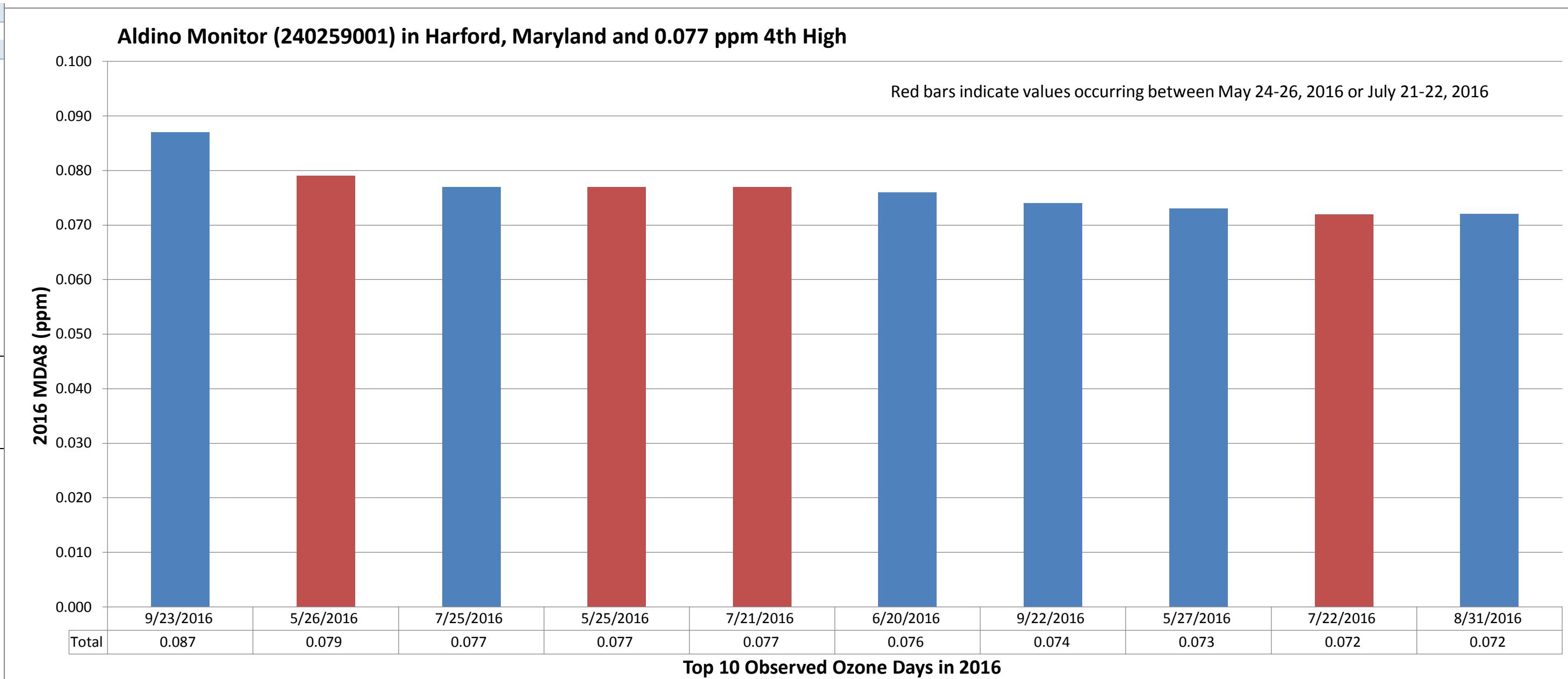
AQS_SITE_ID	240251001
Row Labels	Sum of Daily MDA8
7/22/2016	0.082
9/23/2016	0.080
5/26/2016	0.080
7/27/2016	0.079
6/20/2016	0.079
5/25/2016	0.079
9/14/2016	0.077
7/25/2016	0.076
7/21/2016	0.072
5/27/2016	0.070
6/19/2016	0.070

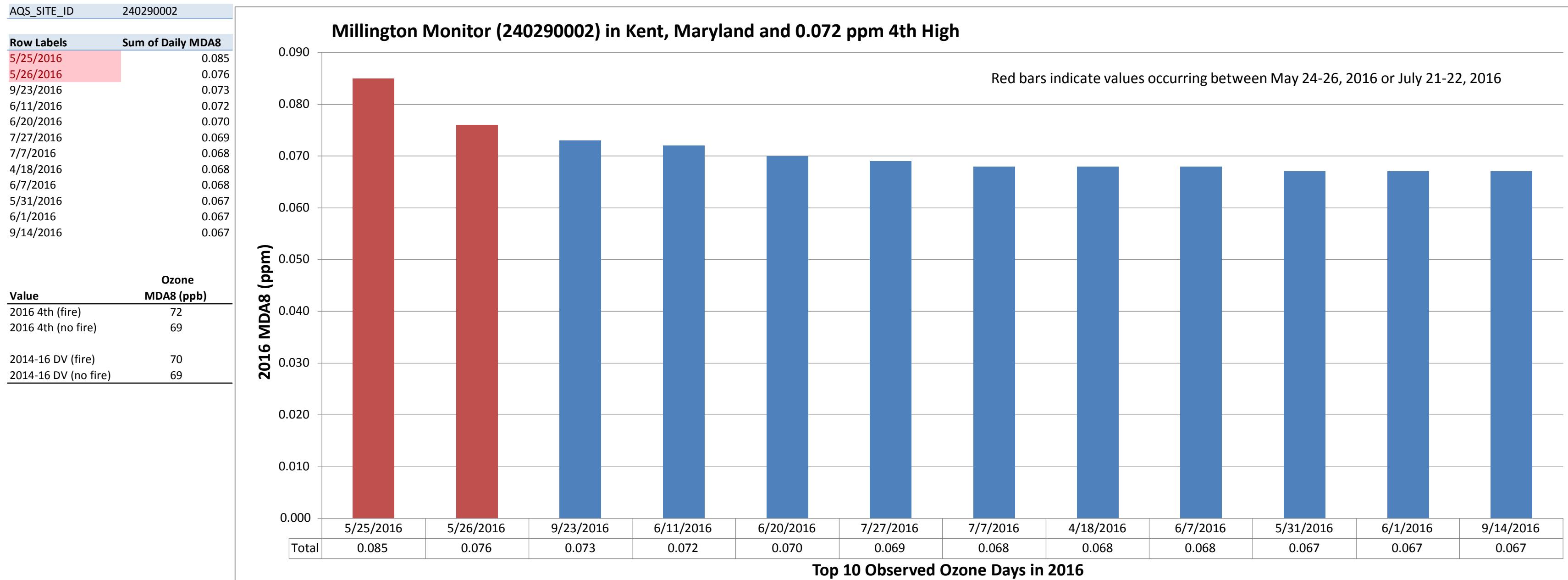
Value	Ozone MDA8 (ppb)
2016 4th (fire)	79
2016 4th (no fire)	77
2014-16 DV (fire)	73
2014-16 DV (no fire)	72

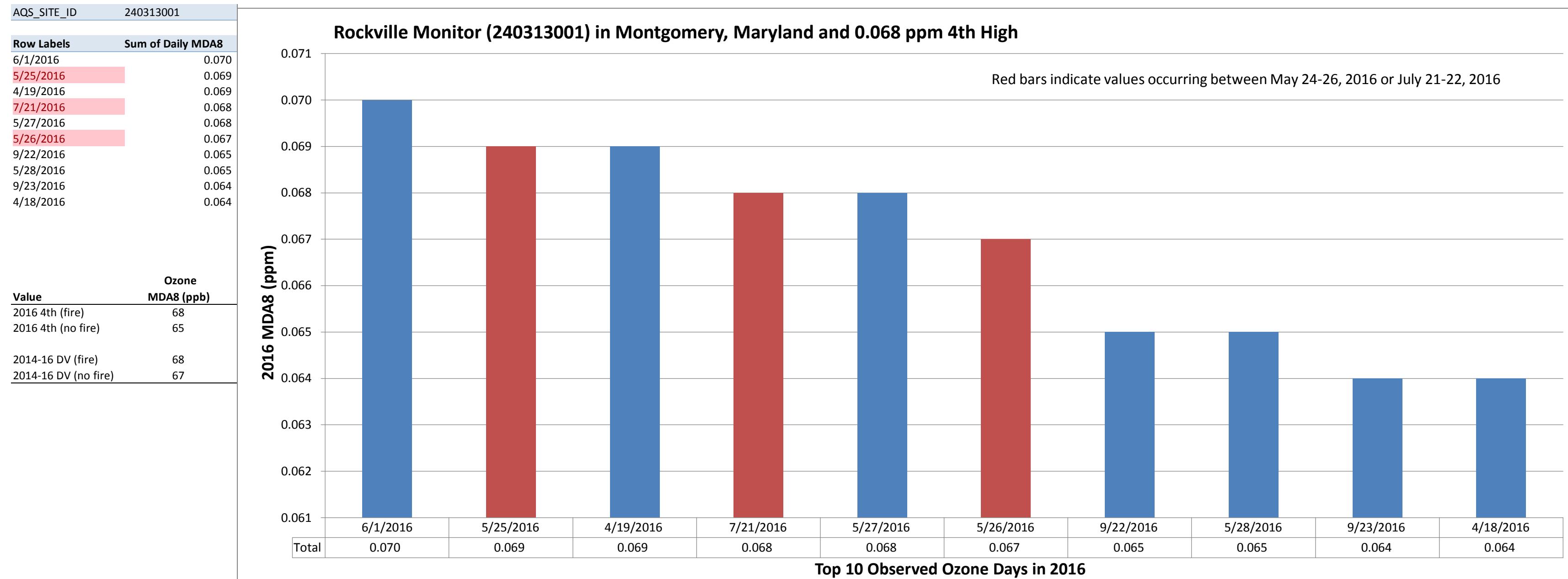


AQS_SITE_ID	240259001
Row Labels	Sum of Daily MDA8
9/23/2016	0.087
5/26/2016	0.079
7/25/2016	0.077
5/25/2016	0.077
7/21/2016	0.077
6/20/2016	0.076
9/22/2016	0.074
5/27/2016	0.073
7/22/2016	0.072
8/31/2016	0.072

Value	Ozone MDA8 (ppb)
2016 4th (fire)	77
2016 4th (no fire)	74
2014-16 DV (fire)	73
2014-16 DV (no fire)	72

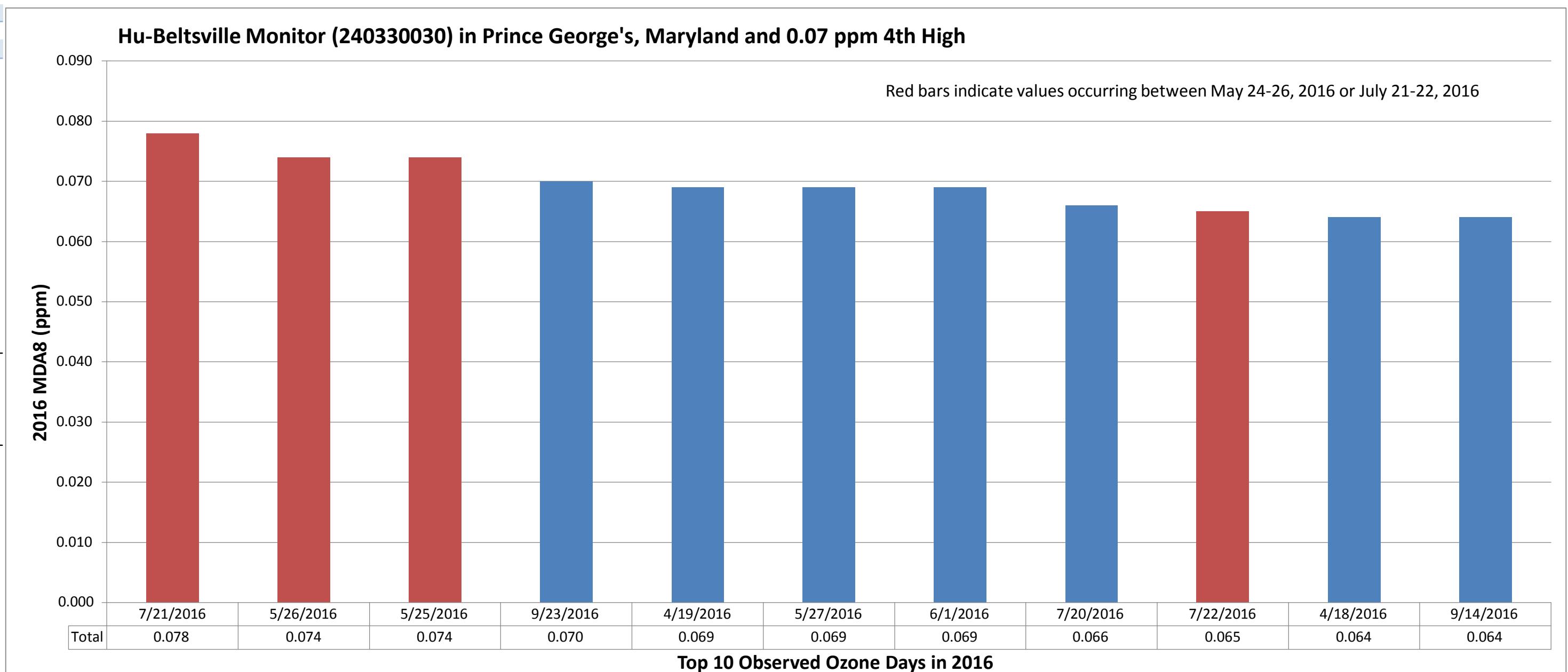


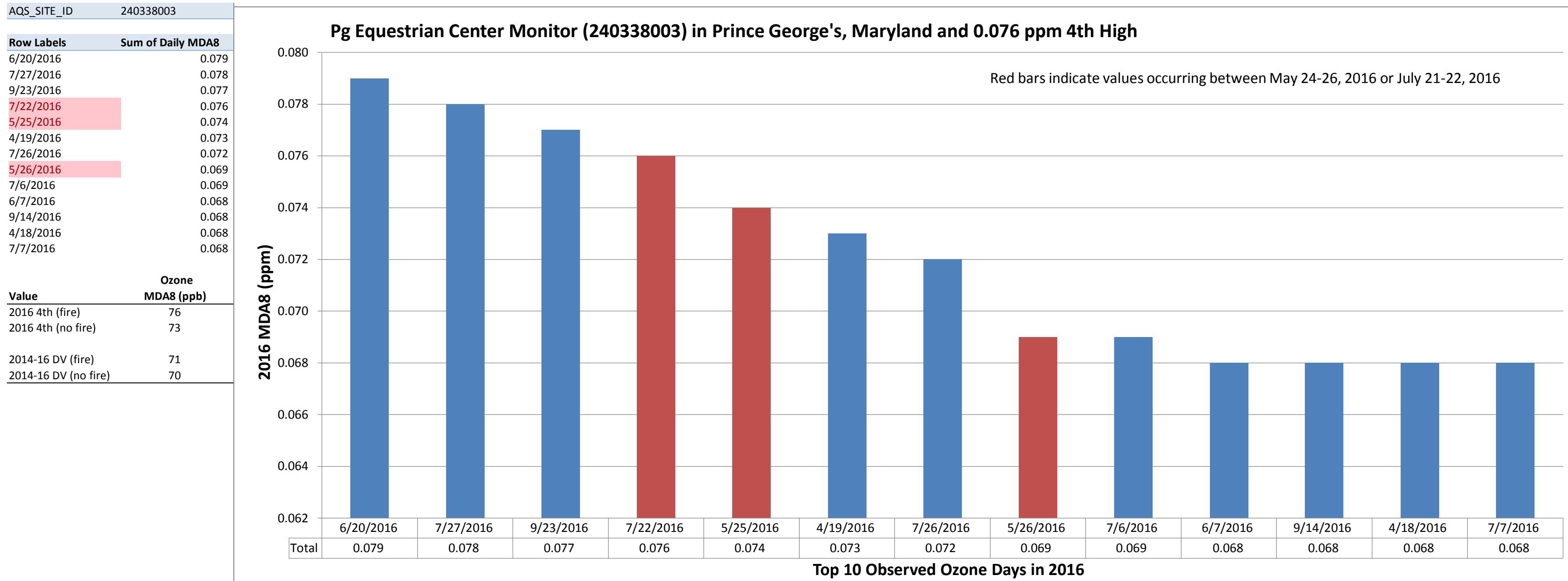




AQS_SITE_ID	240330030
Row Labels	Sum of Daily MDA8
7/21/2016	0.078
5/26/2016	0.074
5/25/2016	0.074
9/23/2016	0.070
4/19/2016	0.069
5/27/2016	0.069
6/1/2016	0.069
7/20/2016	0.066
7/22/2016	0.065
4/18/2016	0.064
9/14/2016	0.064

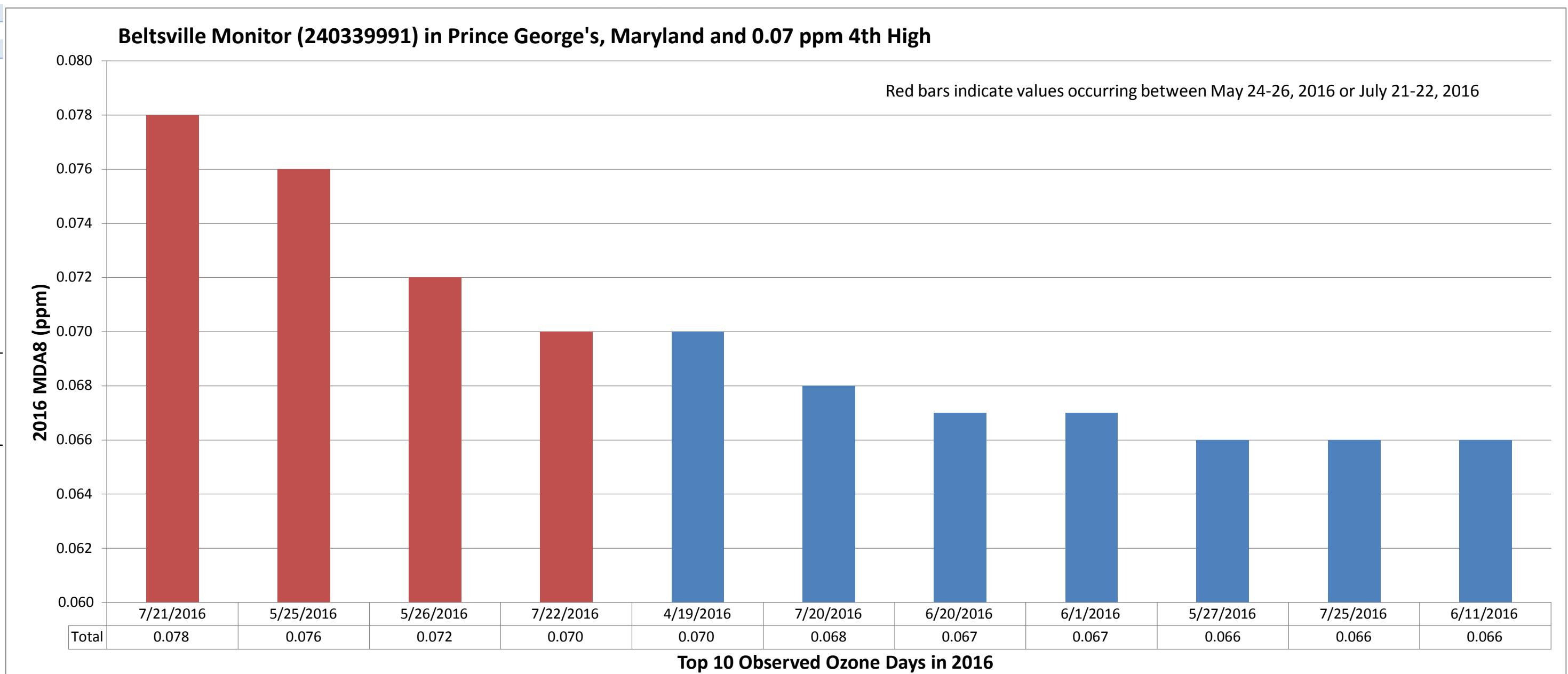
Value	Ozone MDA8 (ppb)
2016 4th (fire)	70
2016 4th (no fire)	69
2014-16 DV (fire)	69
2014-16 DV (no fire)	68





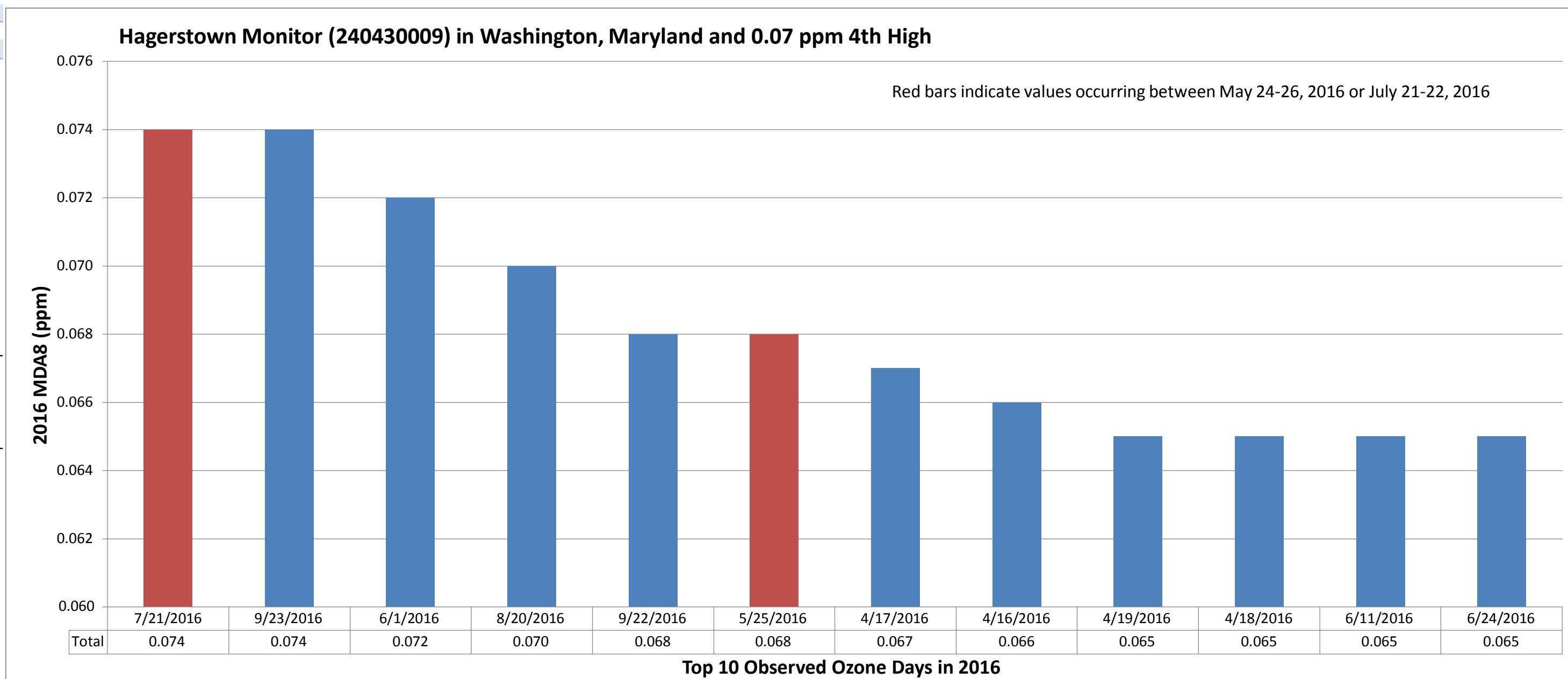
AQS_SITE_ID	240339991
Row Labels	Sum of Daily MDA8
7/21/2016	0.078
5/25/2016	0.076
5/26/2016	0.072
7/22/2016	0.070
4/19/2016	0.070
7/20/2016	0.068
6/20/2016	0.067
6/1/2016	0.067
5/27/2016	0.066
7/25/2016	0.066
6/11/2016	0.066

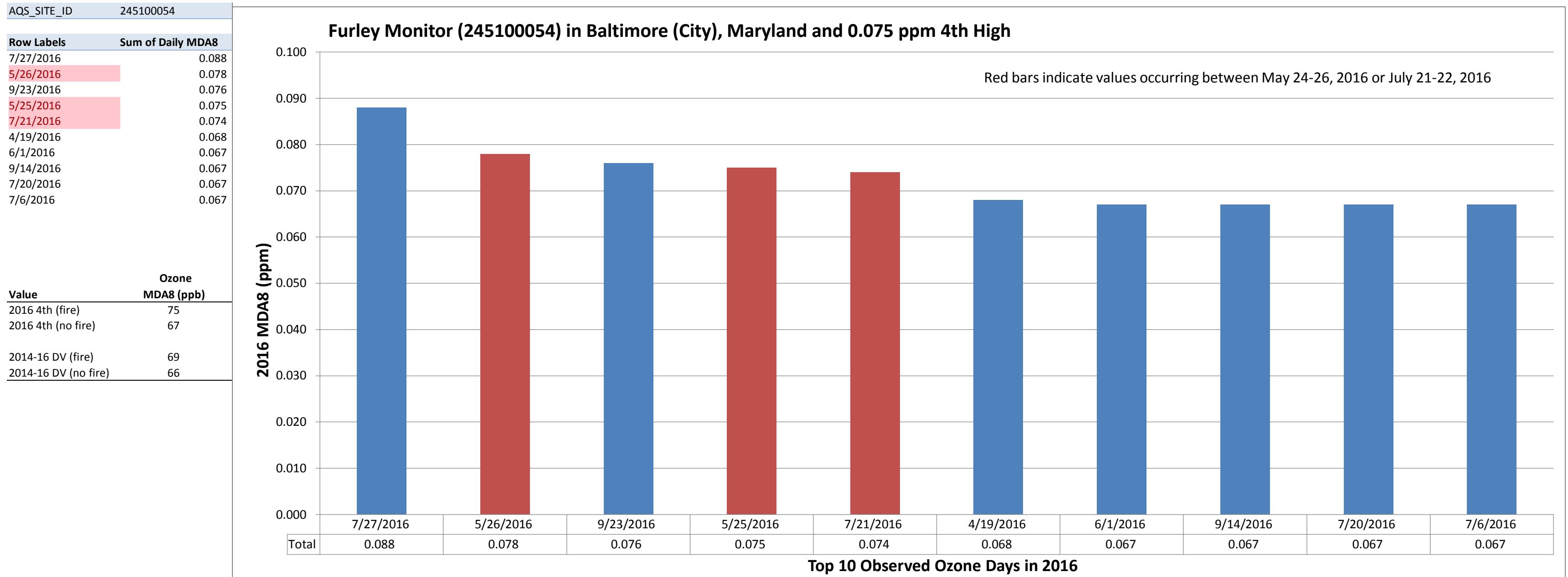
Value	Ozone MDA8 (ppb)
2016 4th (fire)	70
2016 4th (no fire)	67
2014-16 DV (fire)	68
2014-16 DV (no fire)	67

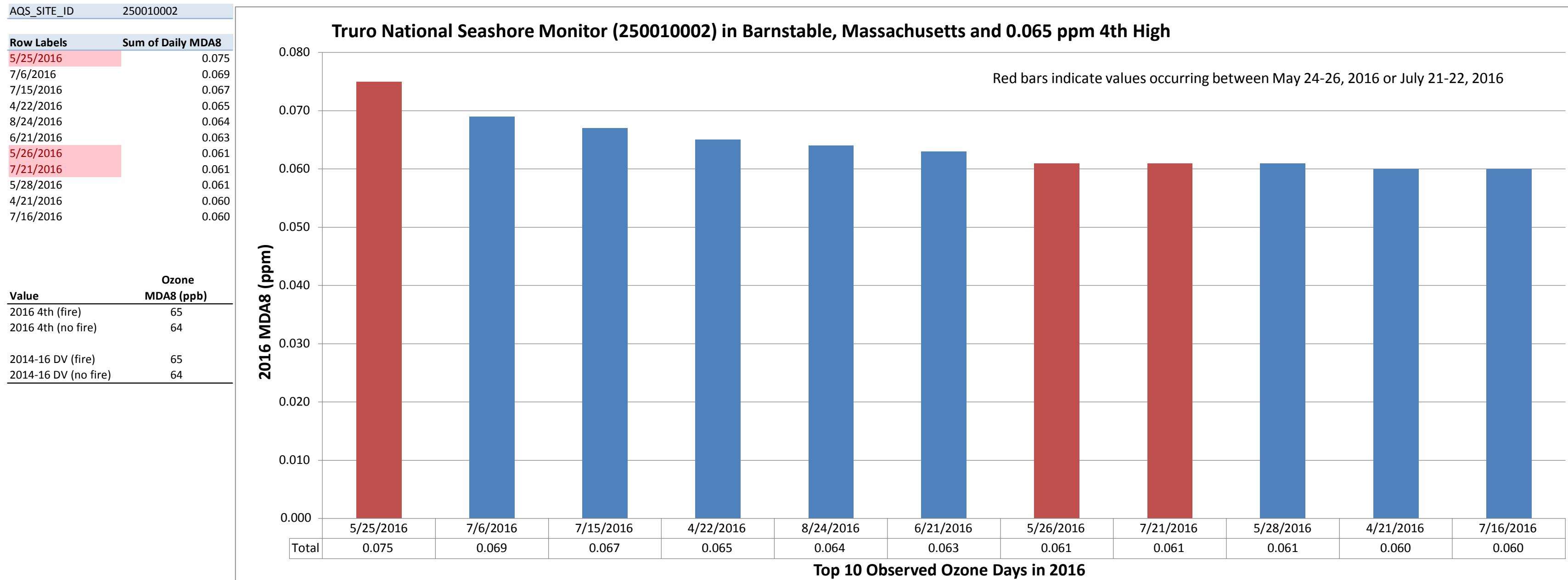


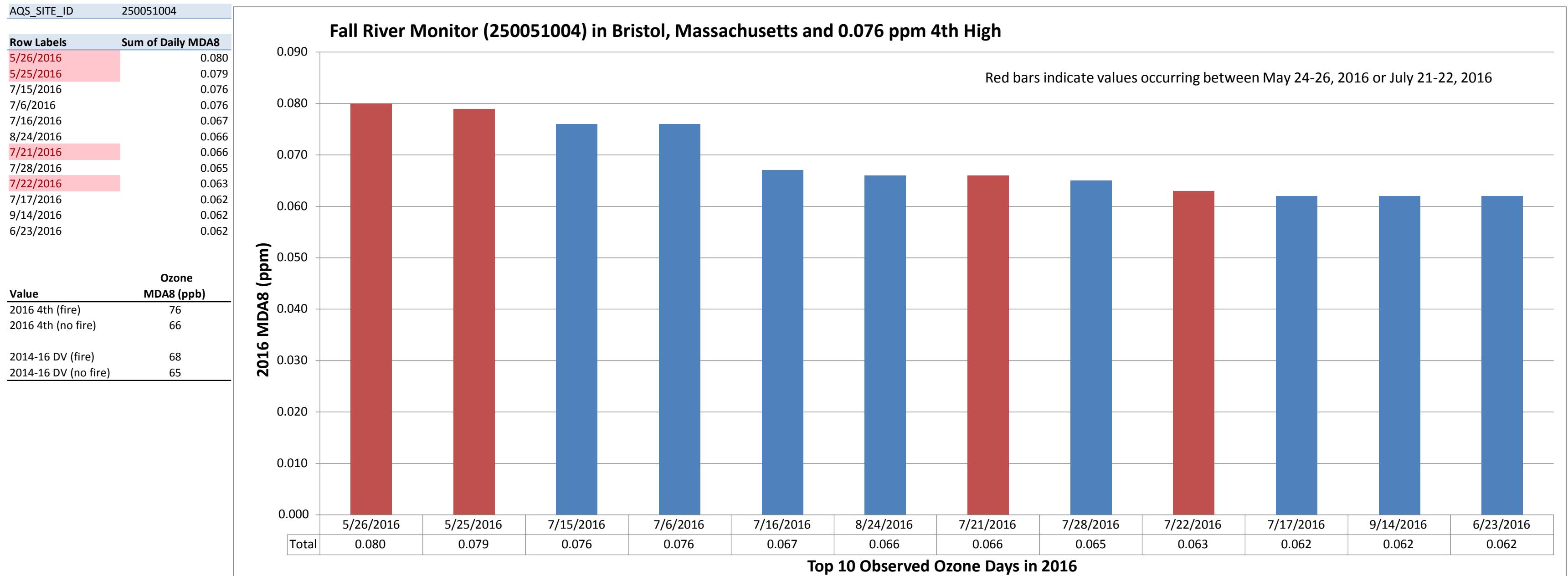
AQS_SITE_ID	240430009
Row Labels	Sum of Daily MDA8
7/21/2016	0.074
9/23/2016	0.074
6/1/2016	0.072
8/20/2016	0.070
9/22/2016	0.068
5/25/2016	0.068
4/17/2016	0.067
4/16/2016	0.066
4/19/2016	0.065
4/18/2016	0.065
6/11/2016	0.065
6/24/2016	0.065

Value	Ozone MDA8 (ppb)
2016 4th (fire)	70
2016 4th (no fire)	68
2014-16 DV (fire)	66
2014-16 DV (no fire)	65



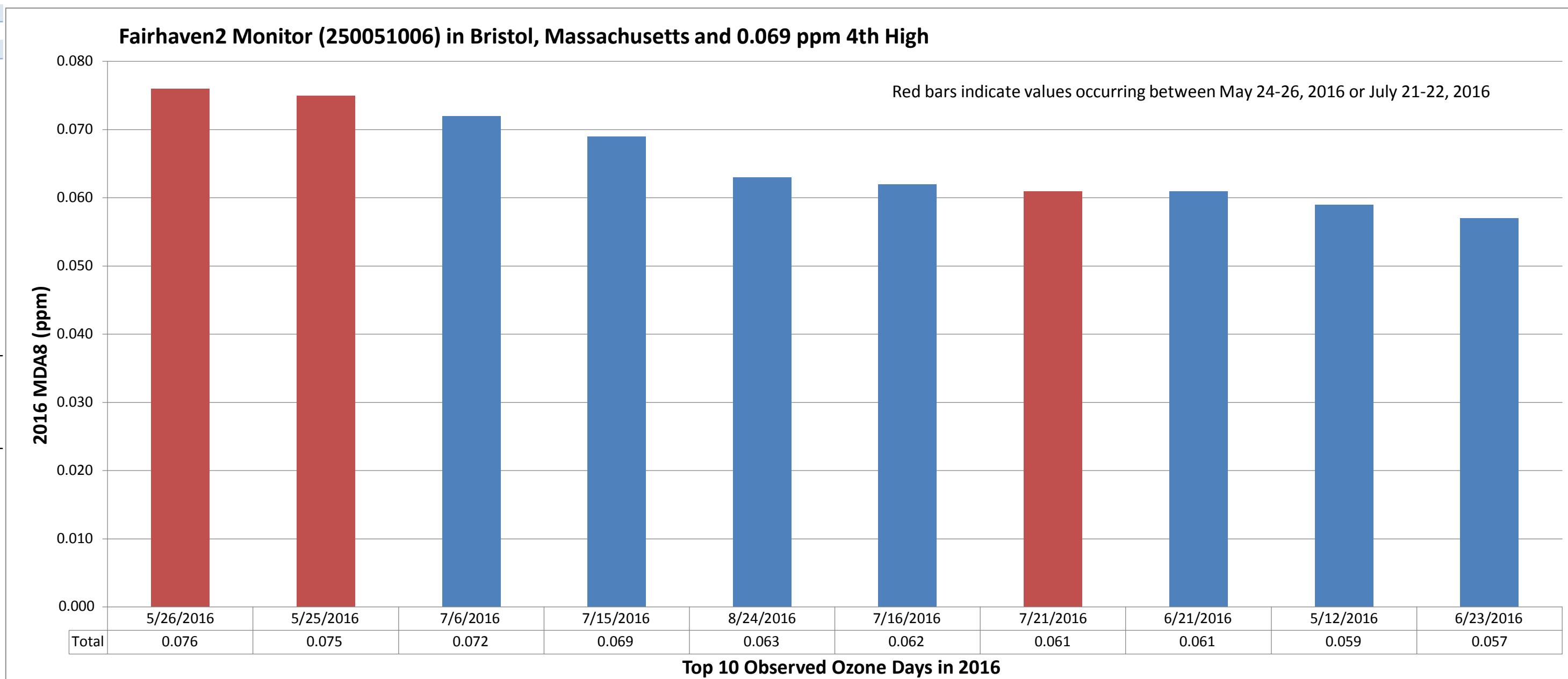






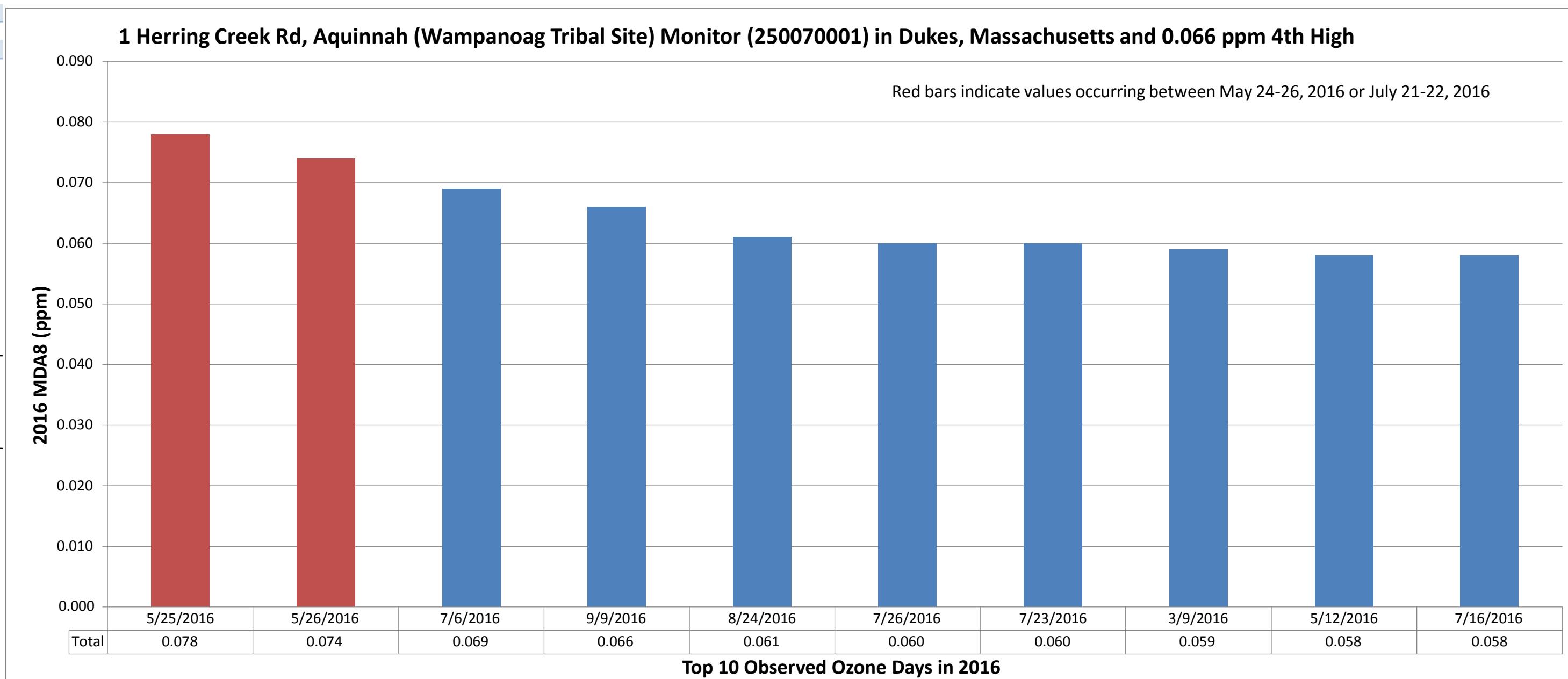
AQS_SITE_ID	250051006
Row Labels	Sum of Daily MDA8
5/26/2016	0.076
5/25/2016	0.075
7/6/2016	0.072
7/15/2016	0.069
8/24/2016	0.063
7/16/2016	0.062
7/21/2016	0.061
6/21/2016	0.061
5/12/2016	0.059
6/23/2016	0.057

Value	Ozone MDA8 (ppb)
2016 4th (fire)	69
2016 4th (no fire)	62
2014-16 DV (fire)	64
2014-16 DV (no fire)	62



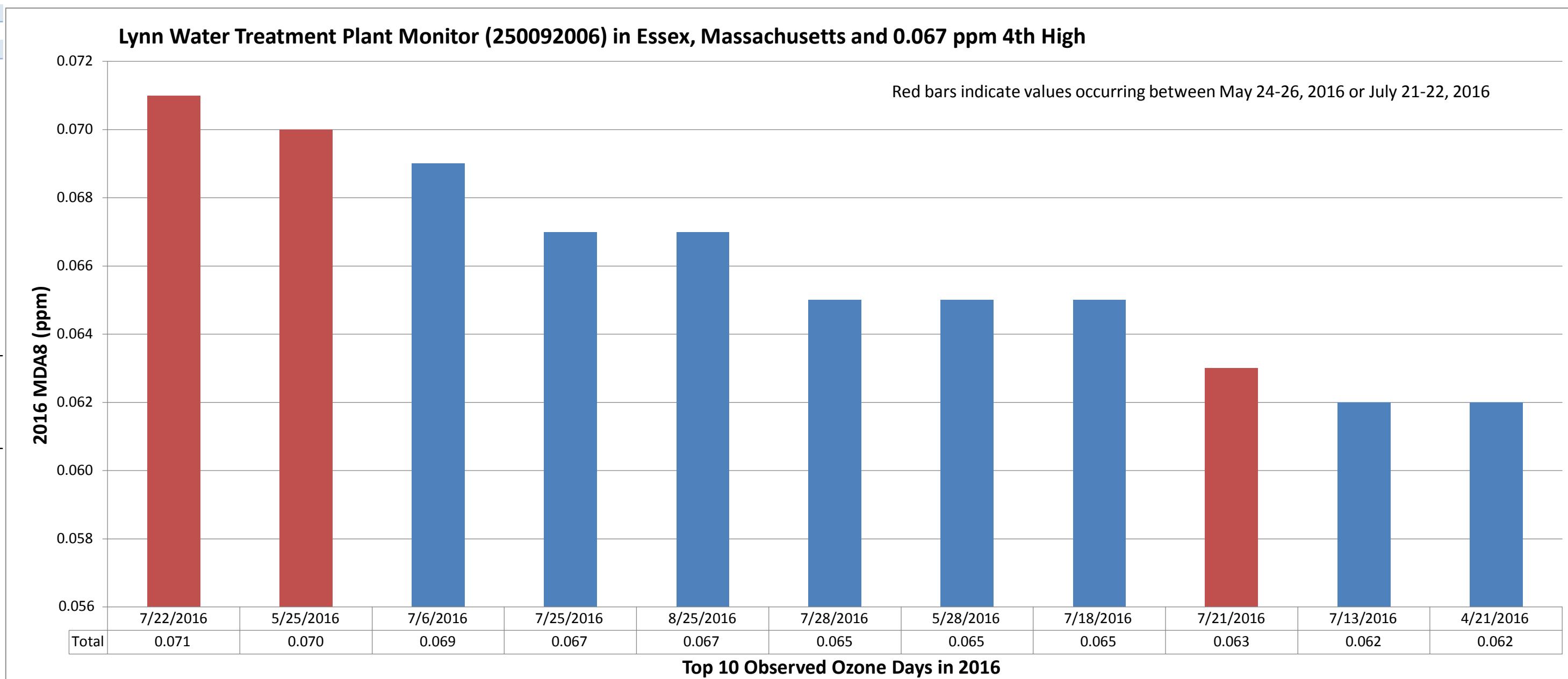
AQS_SITE_ID	250070001
Row Labels	Sum of Daily MDA8
5/25/2016	0.078
5/26/2016	0.074
7/6/2016	0.069
9/9/2016	0.066
8/24/2016	0.061
7/26/2016	0.060
7/23/2016	0.060
3/9/2016	0.059
5/12/2016	0.058
7/16/2016	0.058

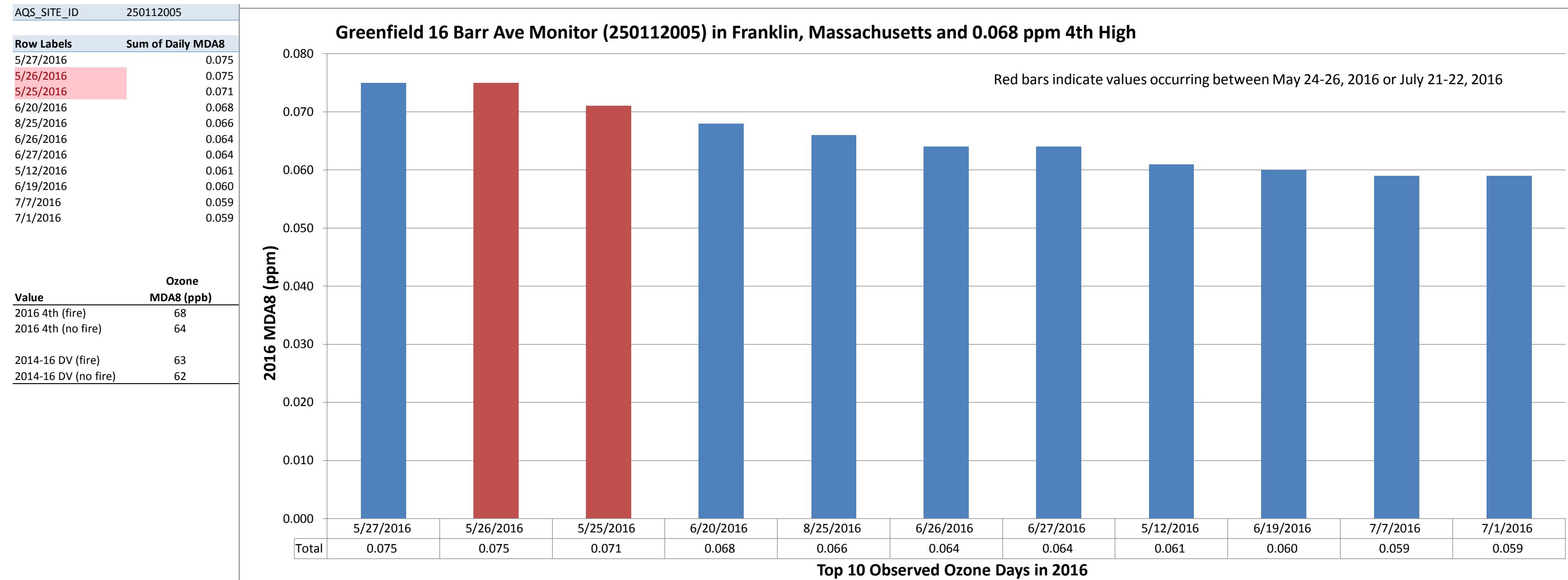
Value	Ozone MDA8 (ppb)
2016 4th (fire)	66
2016 4th (no fire)	60
2014-16 DV (fire)	64
2014-16 DV (no fire)	62

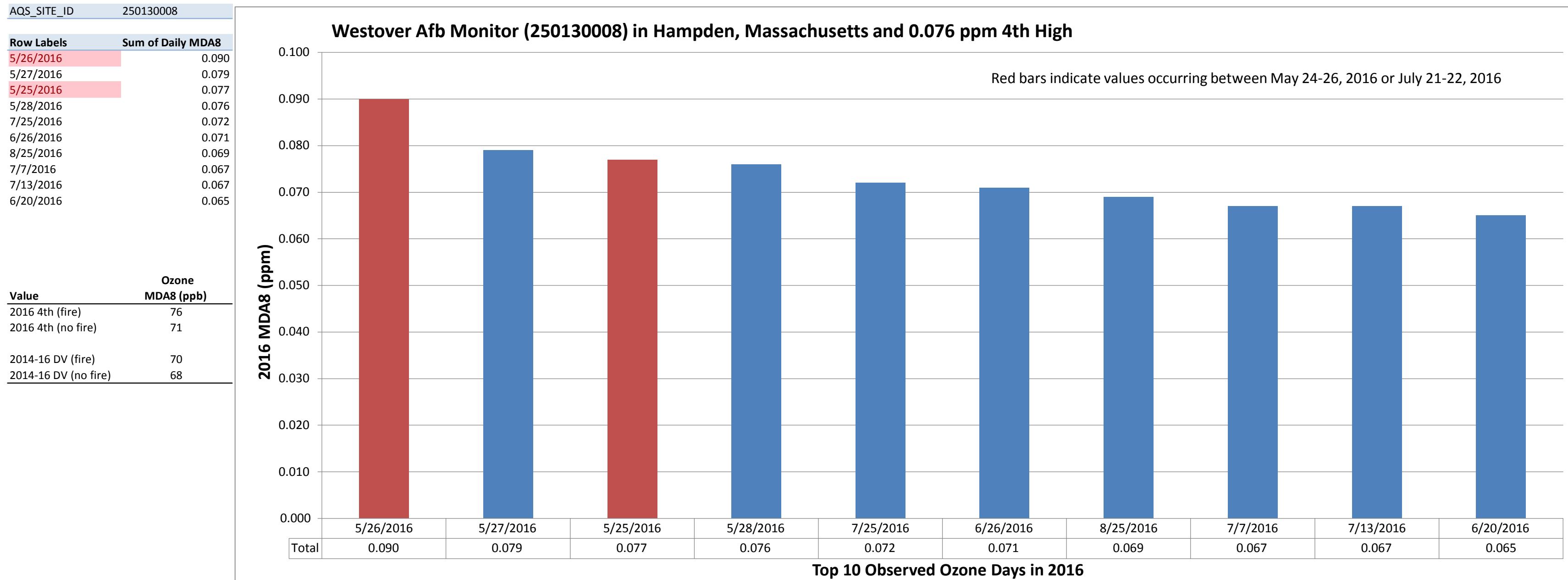


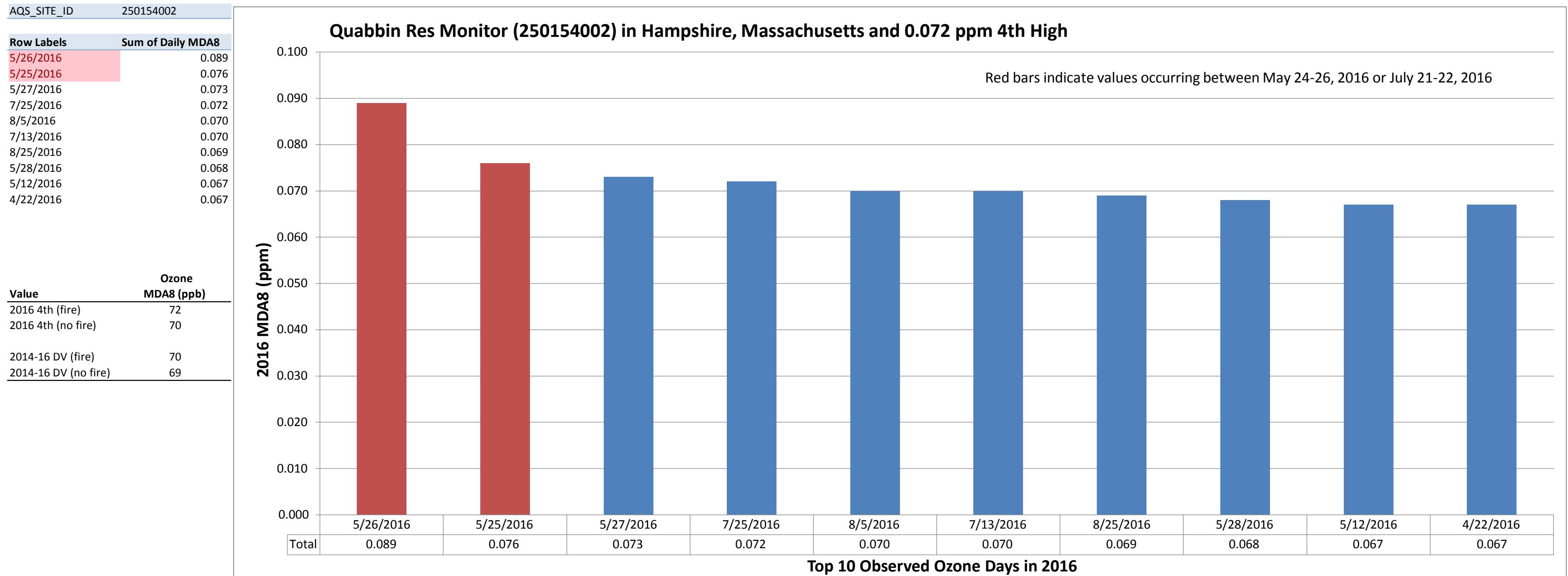
AQS_SITE_ID	250092006
Row Labels	Sum of Daily MDA8
7/22/2016	0.071
5/25/2016	0.070
7/6/2016	0.069
7/25/2016	0.067
8/25/2016	0.067
7/28/2016	0.065
5/28/2016	0.065
7/18/2016	0.065
7/21/2016	0.063
7/13/2016	0.062
4/21/2016	0.062

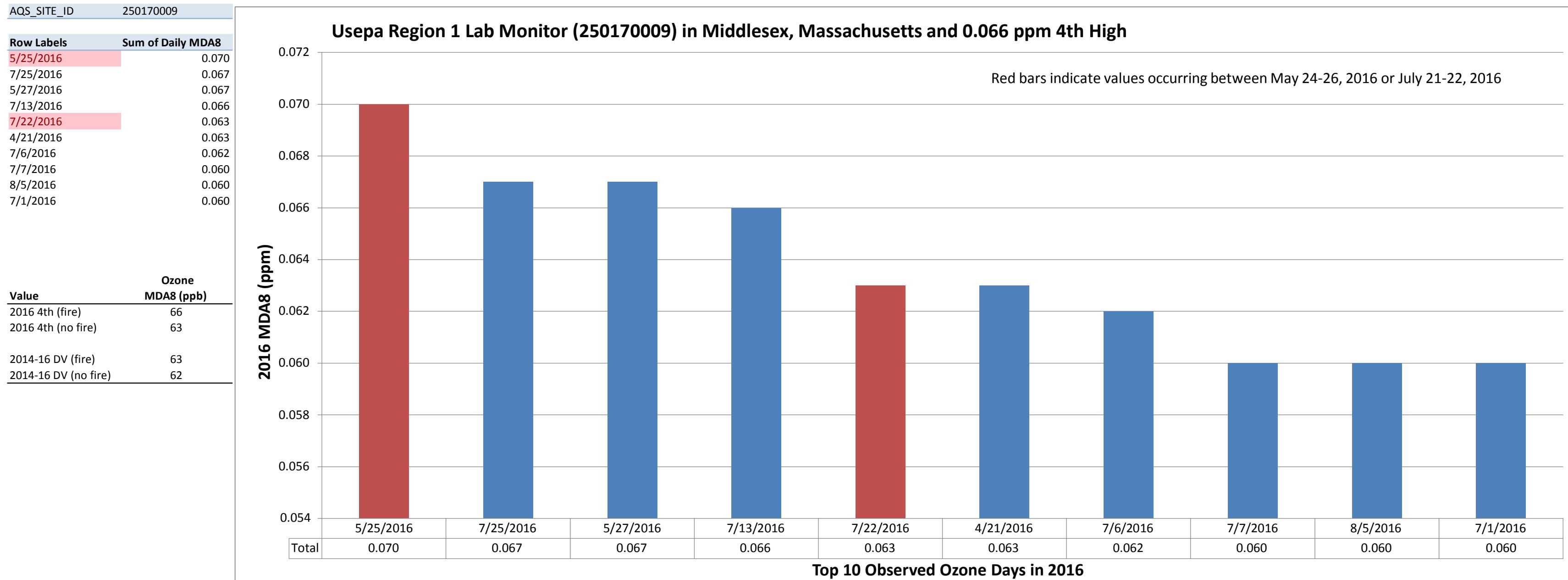
Value	Ozone MDA8 (ppb)
2016 4th (fire)	67
2016 4th (no fire)	65
2014-16 DV (fire)	65
2014-16 DV (no fire)	64





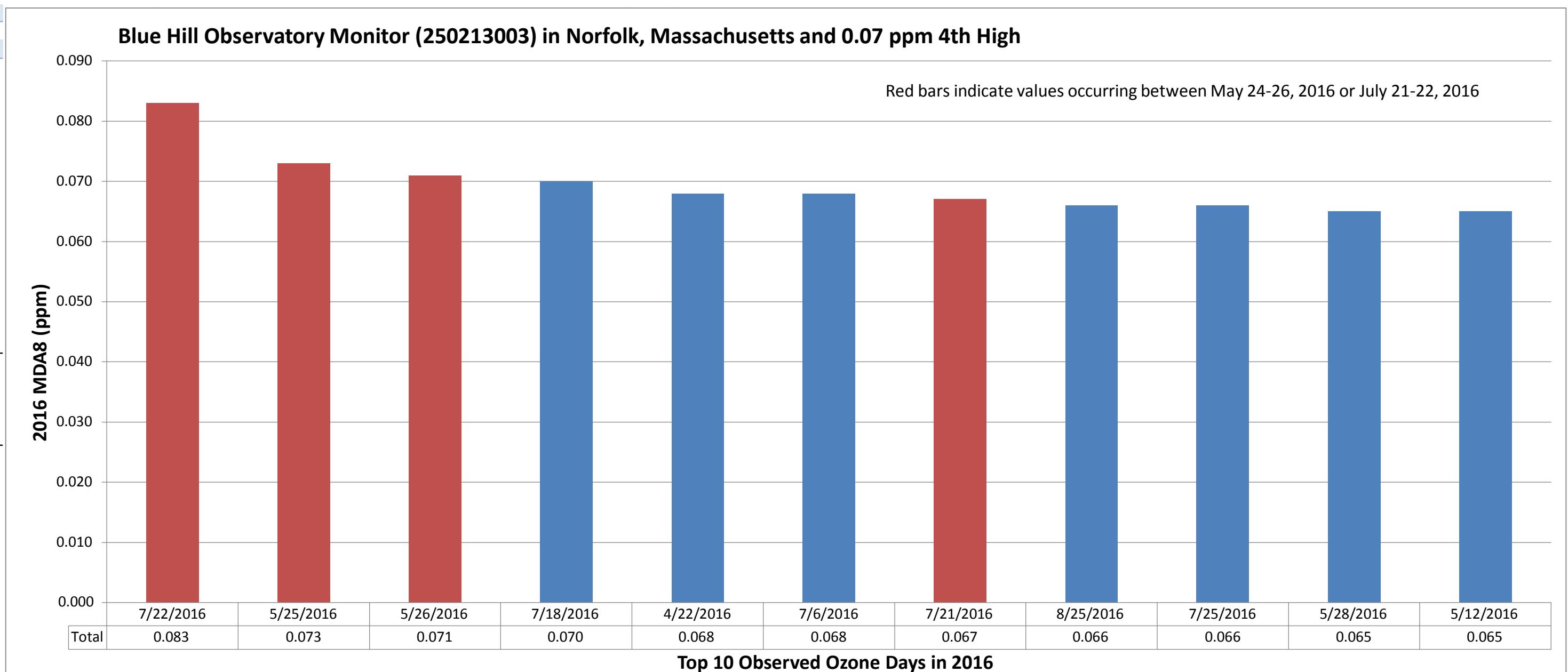






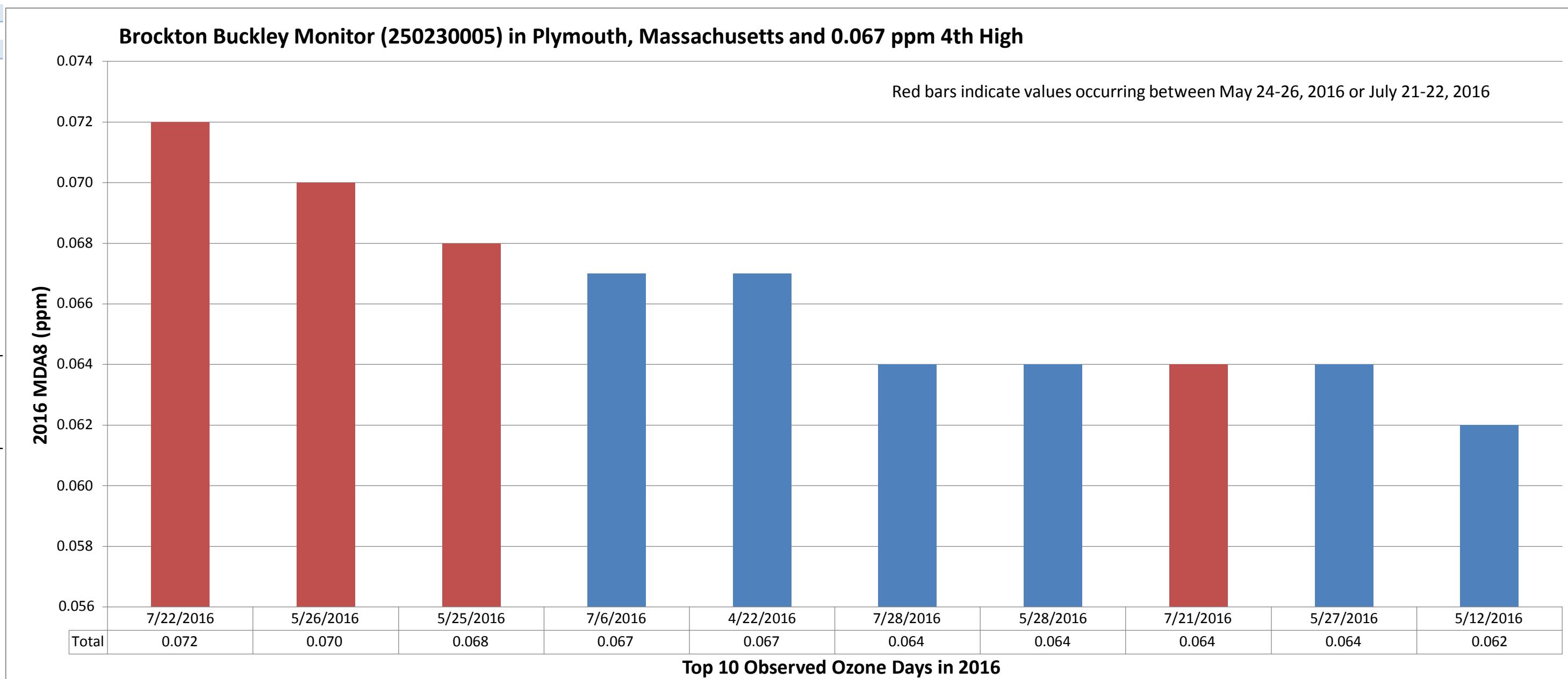
AQS_SITE_ID	250213003
Row Labels	Sum of Daily MDA8
7/22/2016	0.083
5/25/2016	0.073
5/26/2016	0.071
7/18/2016	0.070
4/22/2016	0.068
7/6/2016	0.068
7/21/2016	0.067
8/25/2016	0.066
7/25/2016	0.066
5/28/2016	0.065
5/12/2016	0.065

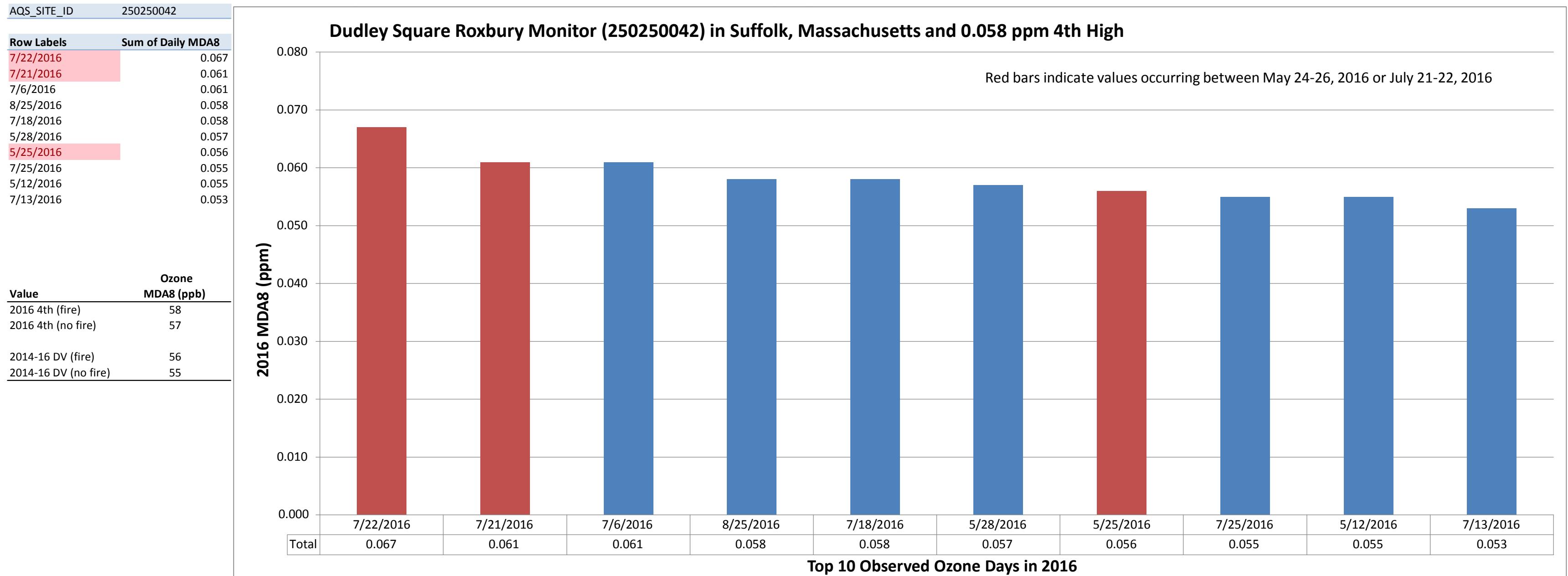
Value	Ozone MDA8 (ppb)
2016 4th (fire)	70
2016 4th (no fire)	66
2014-16 DV (fire)	67
2014-16 DV (no fire)	66



AQS_SITE_ID	250230005
Row Labels	Sum of Daily MDA8
7/22/2016	0.072
5/26/2016	0.070
5/25/2016	0.068
7/6/2016	0.067
4/22/2016	0.067
7/28/2016	0.064
5/28/2016	0.064
7/21/2016	0.064
5/27/2016	0.064
5/12/2016	0.062

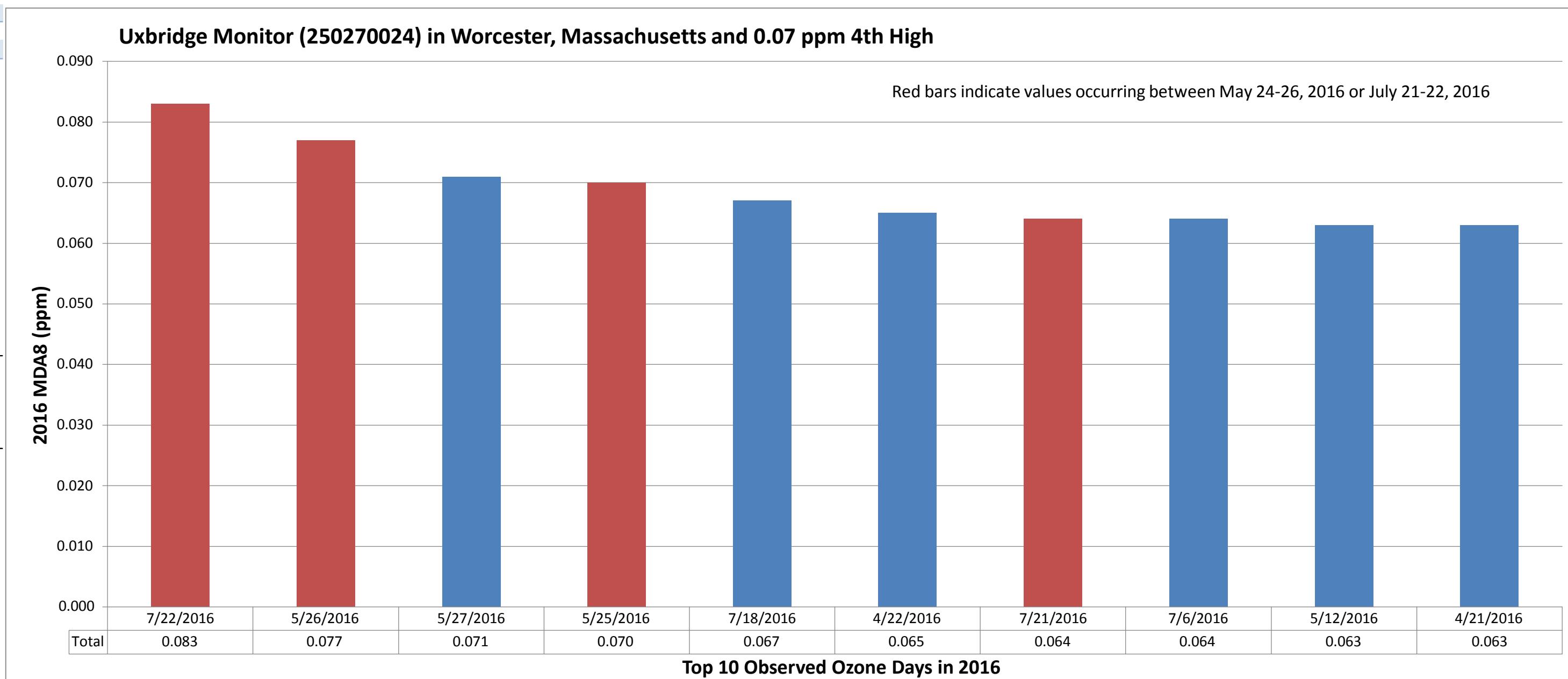
Value	Ozone MDA8 (ppb)
2016 4th (fire)	67
2016 4th (no fire)	64
2014-16 DV (fire)	64
2014-16 DV (no fire)	63

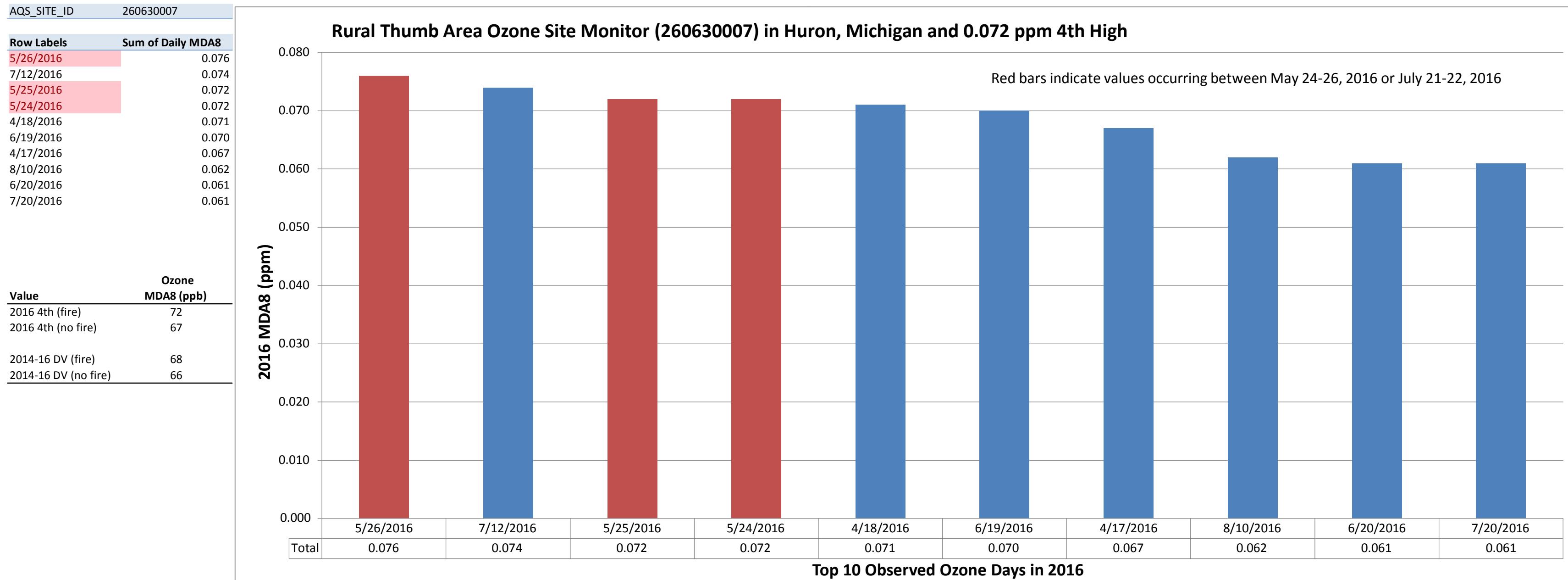


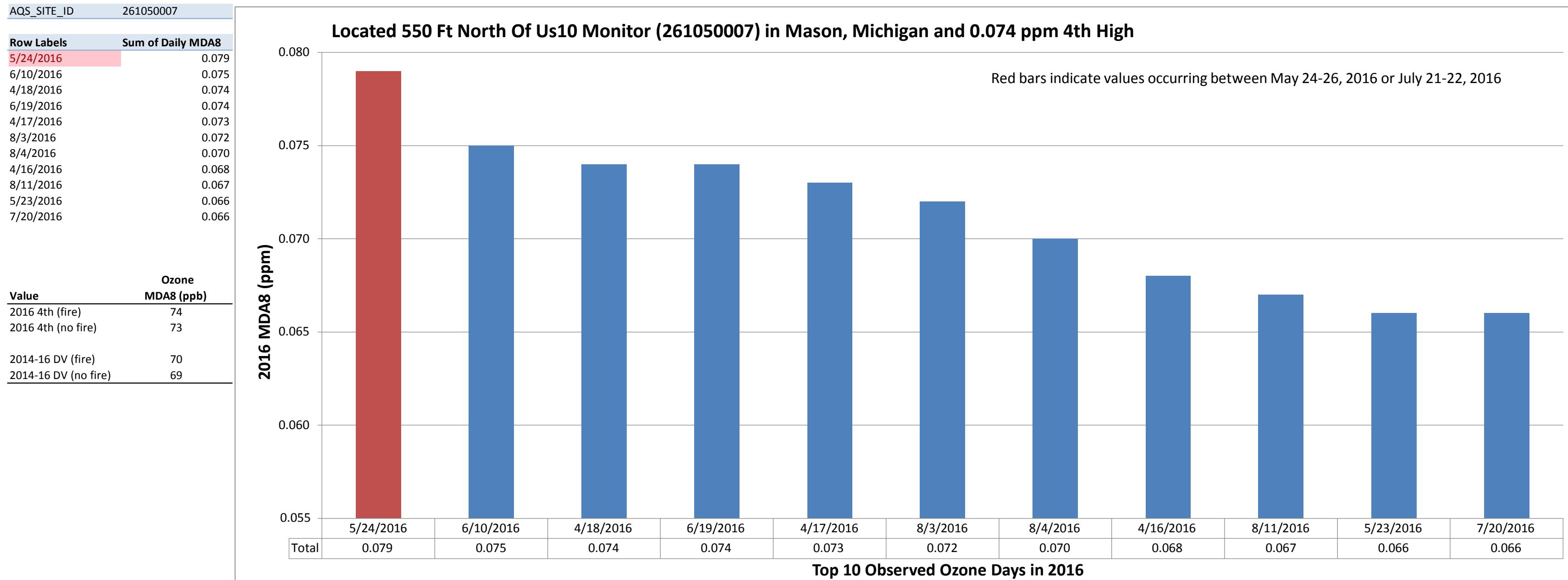


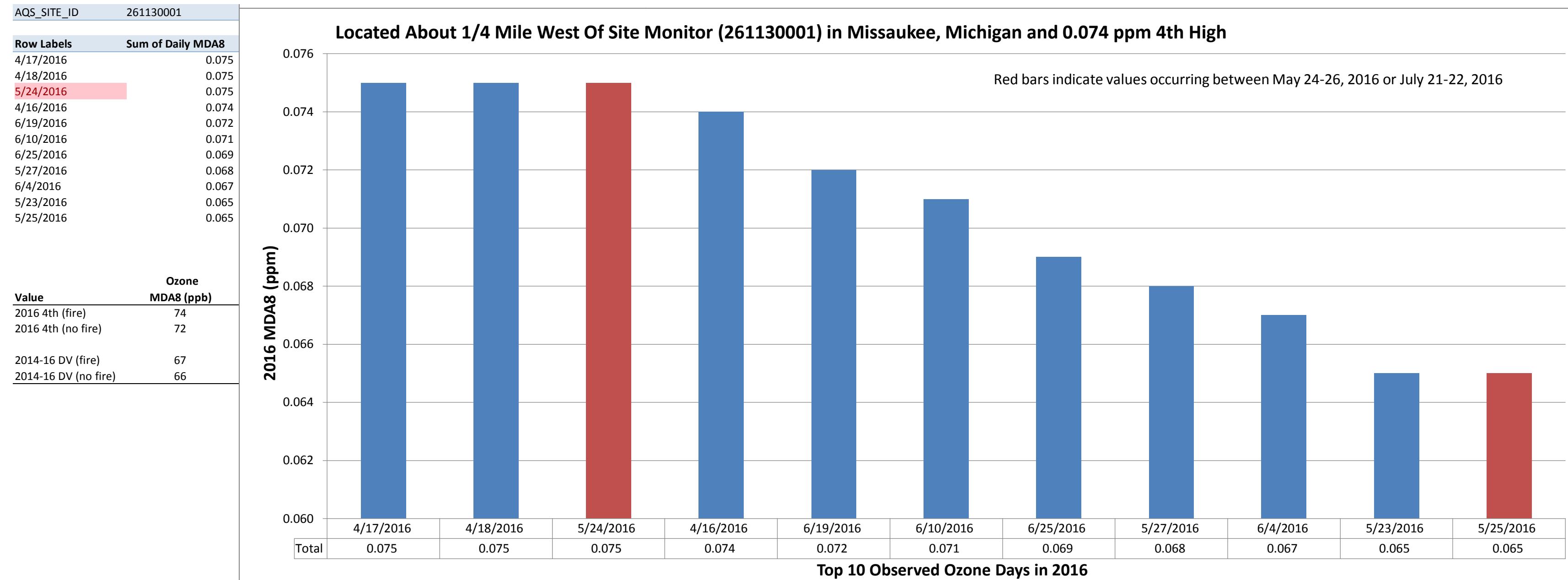
AQS_SITE_ID	250270024
Row Labels	Sum of Daily MDA8
7/22/2016	0.083
5/26/2016	0.077
5/27/2016	0.071
5/25/2016	0.070
7/18/2016	0.067
4/22/2016	0.065
7/21/2016	0.064
7/6/2016	0.064
5/12/2016	0.063
4/21/2016	0.063

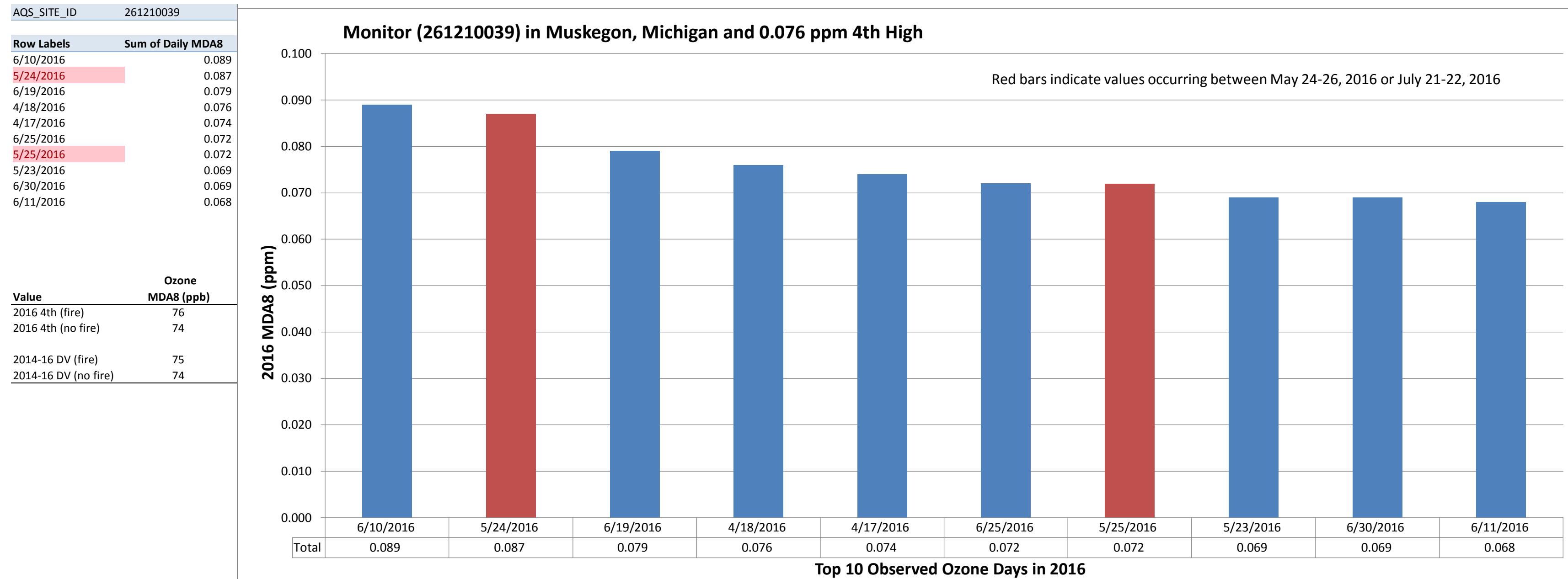
Value	Ozone MDA8 (ppb)
2016 4th (fire)	70
2016 4th (no fire)	64
2014-16 DV (fire)	64
2014-16 DV (no fire)	62





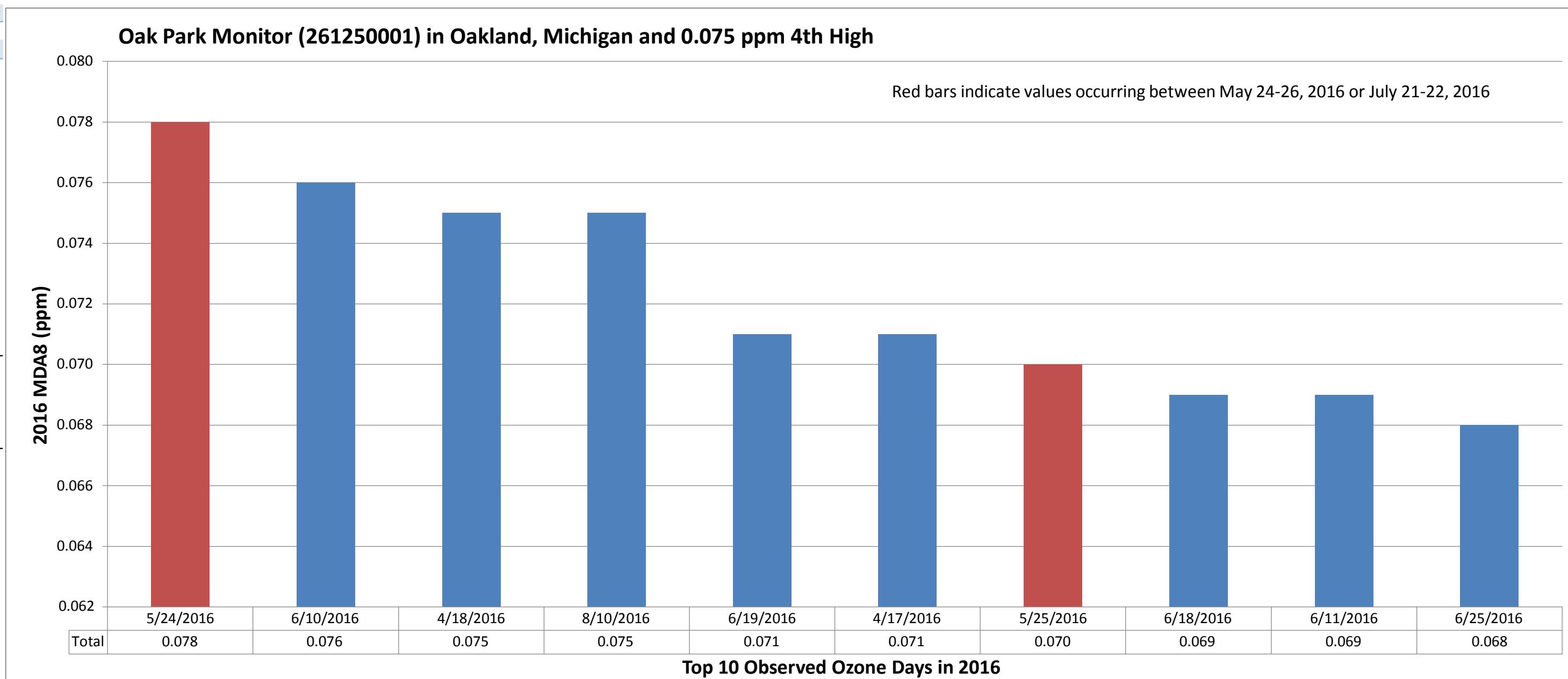






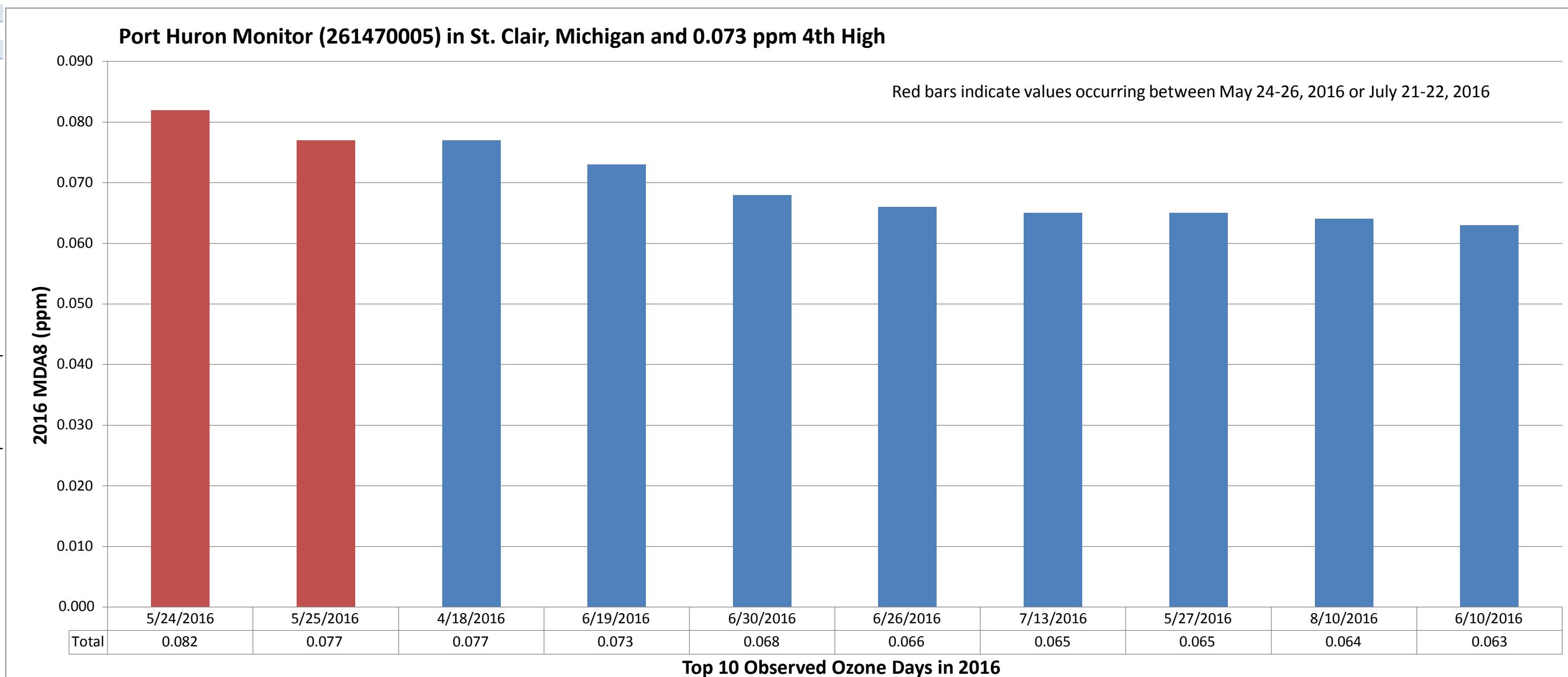
AQS_SITE_ID	261250001
Row Labels	Sum of Daily MDA8
5/24/2016	0.078
6/10/2016	0.076
4/18/2016	0.075
8/10/2016	0.075
6/19/2016	0.071
4/17/2016	0.071
5/25/2016	0.070
6/18/2016	0.069
6/11/2016	0.069
6/25/2016	0.068

Value	Ozone MDA8 (ppb)
2016 4th (fire)	75
2016 4th (no fire)	71
2014-16 DV (fire)	69
2014-16 DV (no fire)	68



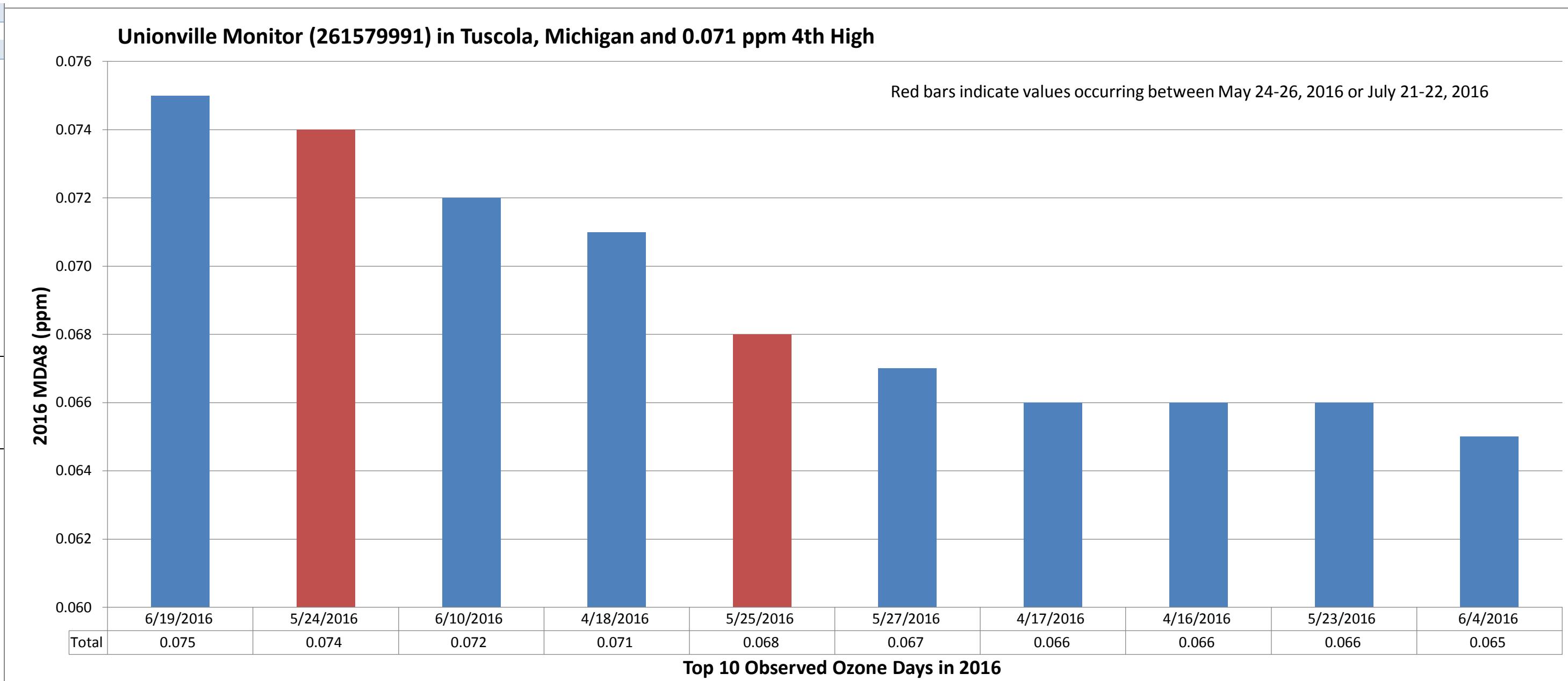
AQS_SITE_ID	261470005
Row Labels	Sum of Daily MDA8
5/24/2016	0.082
5/25/2016	0.077
4/18/2016	0.077
6/19/2016	0.073
6/30/2016	0.068
6/26/2016	0.066
7/13/2016	0.065
5/27/2016	0.065
8/10/2016	0.064
6/10/2016	0.063

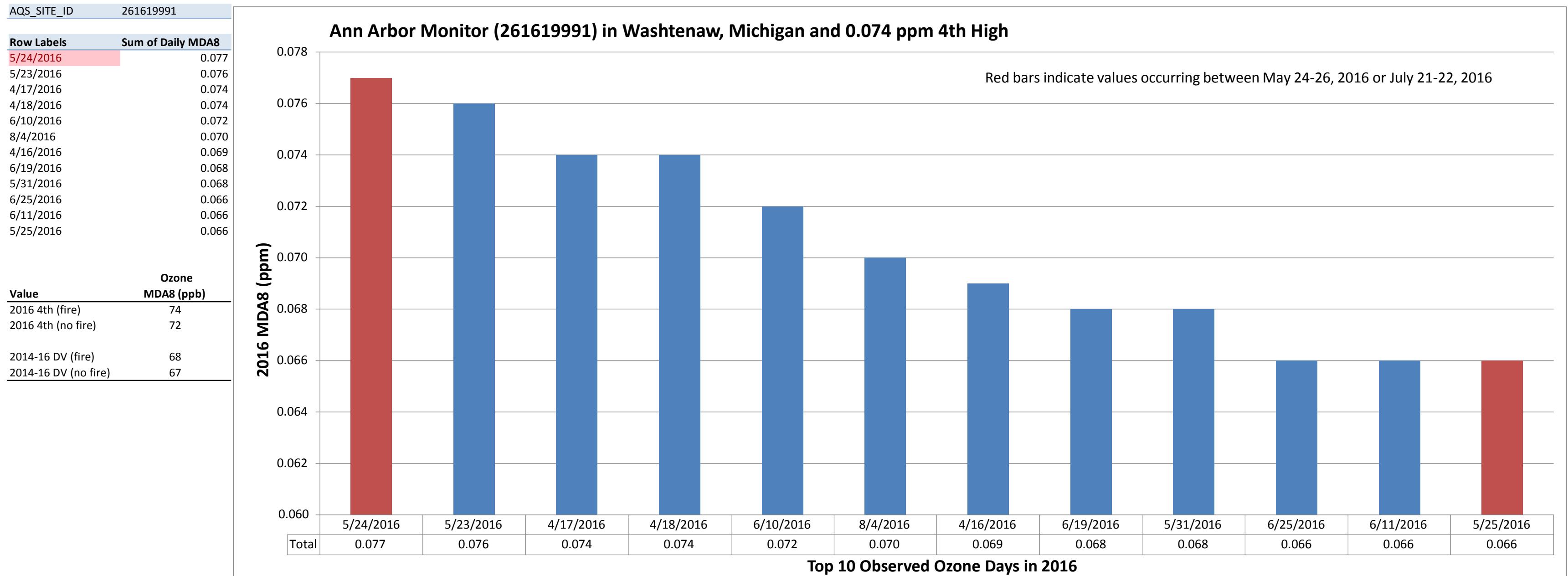
Value	Ozone MDA8 (ppb)
2016 4th (fire)	73
2016 4th (no fire)	66
2014-16 DV (fire)	73
2014-16 DV (no fire)	70



AQS_SITE_ID	261579991
Row Labels	Sum of Daily MDA8
6/19/2016	0.075
5/24/2016	0.074
6/10/2016	0.072
4/18/2016	0.071
5/25/2016	0.068
5/27/2016	0.067
4/17/2016	0.066
4/16/2016	0.066
5/23/2016	0.066
6/4/2016	0.065

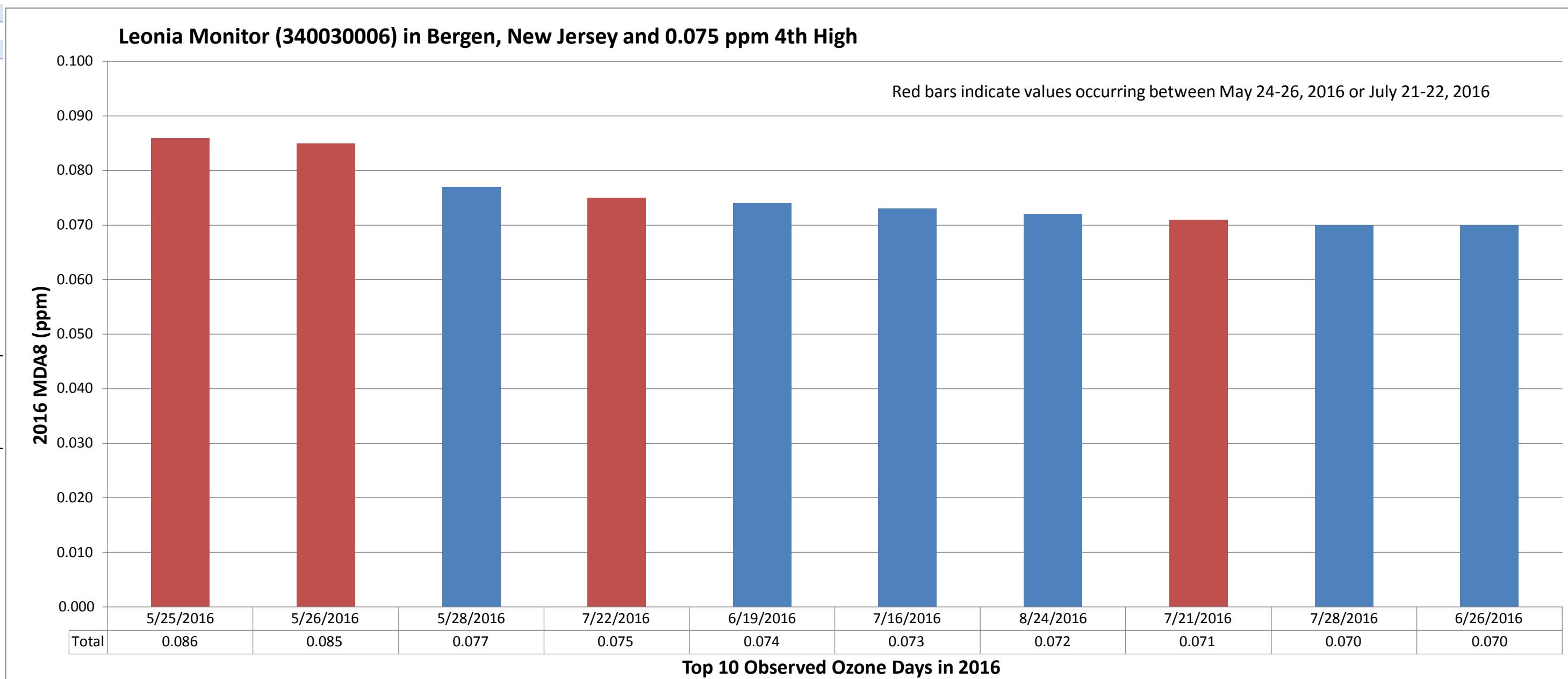
Value	Ozone MDA8 (ppb)
2016 4th (fire)	71
2016 4th (no fire)	67
2014-16 DV (fire)	66
2014-16 DV (no fire)	64





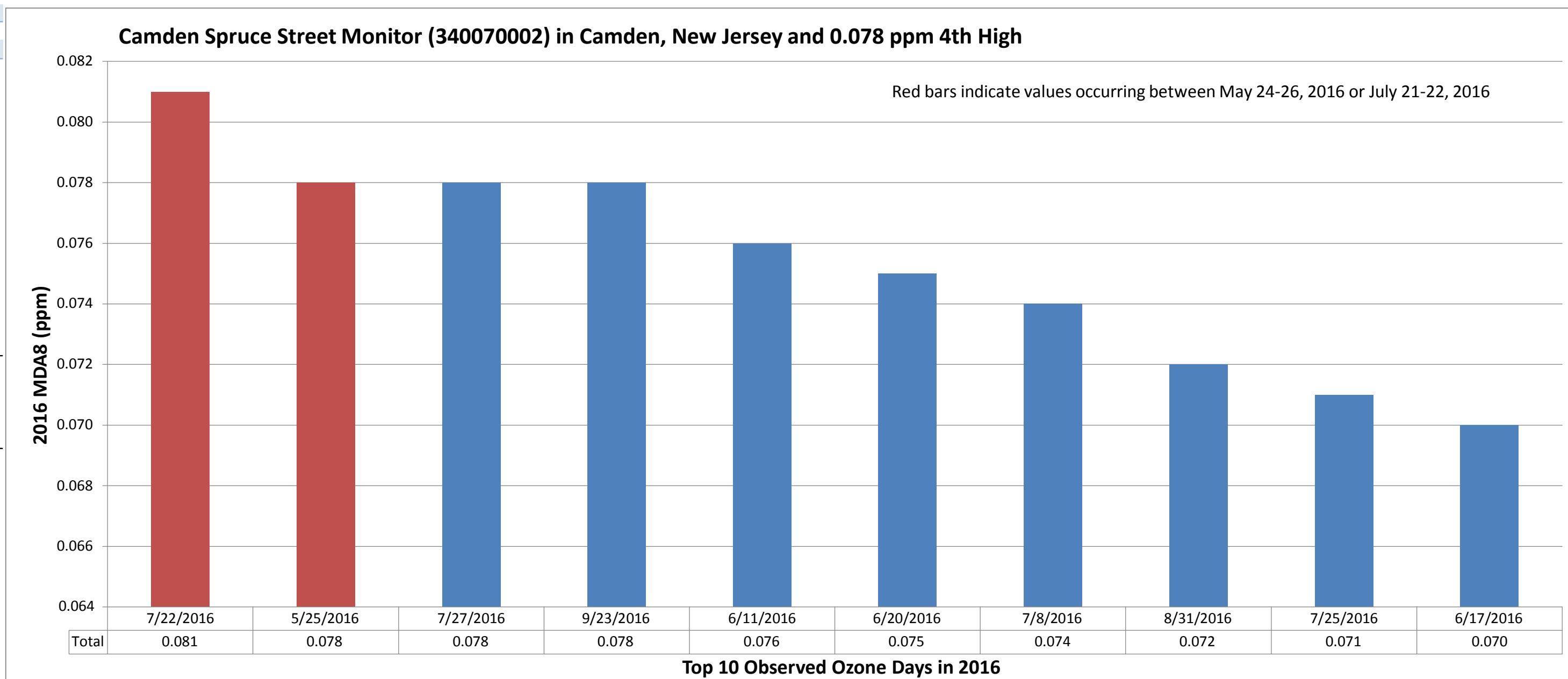
AQS_SITE_ID	340030006
Row Labels	Sum of Daily MDA8
5/25/2016	0.086
5/26/2016	0.085
5/28/2016	0.077
7/22/2016	0.075
6/19/2016	0.074
7/16/2016	0.073
8/24/2016	0.072
7/21/2016	0.071
7/28/2016	0.070
6/26/2016	0.070

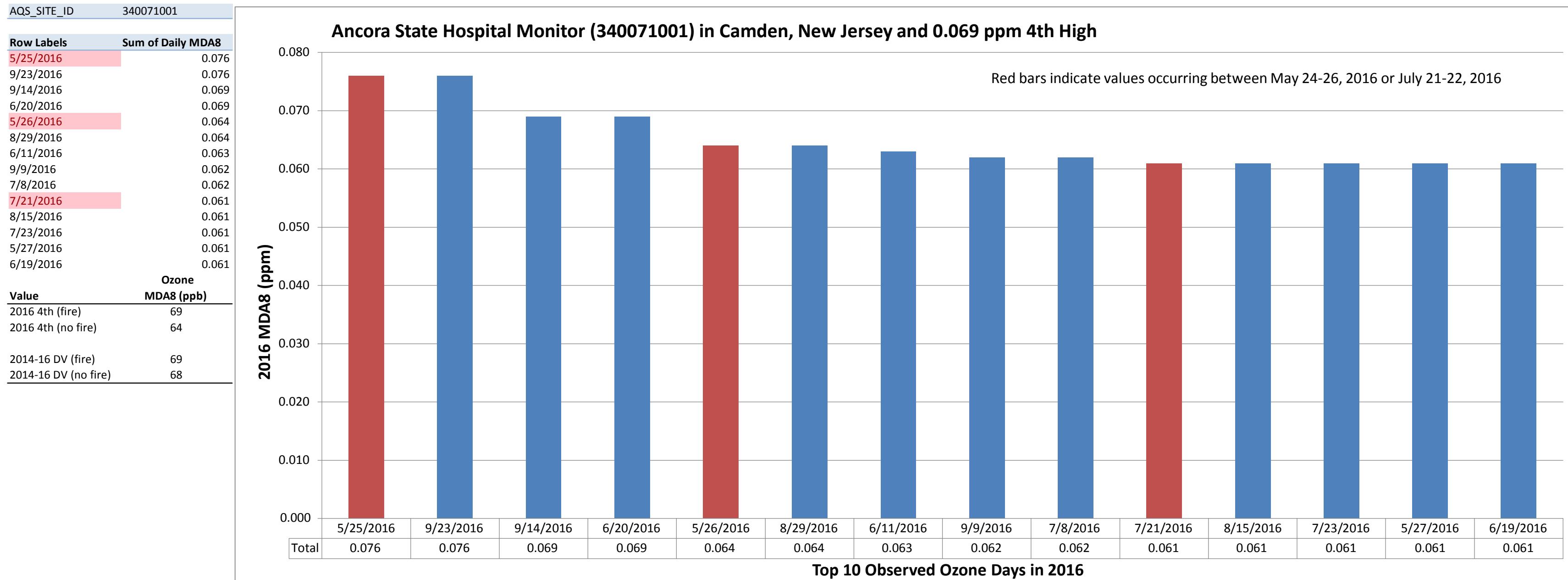
Value	Ozone MDA8 (ppb)
2016 4th (fire)	75
2016 4th (no fire)	72
2014-16 DV (fire)	74
2014-16 DV (no fire)	73

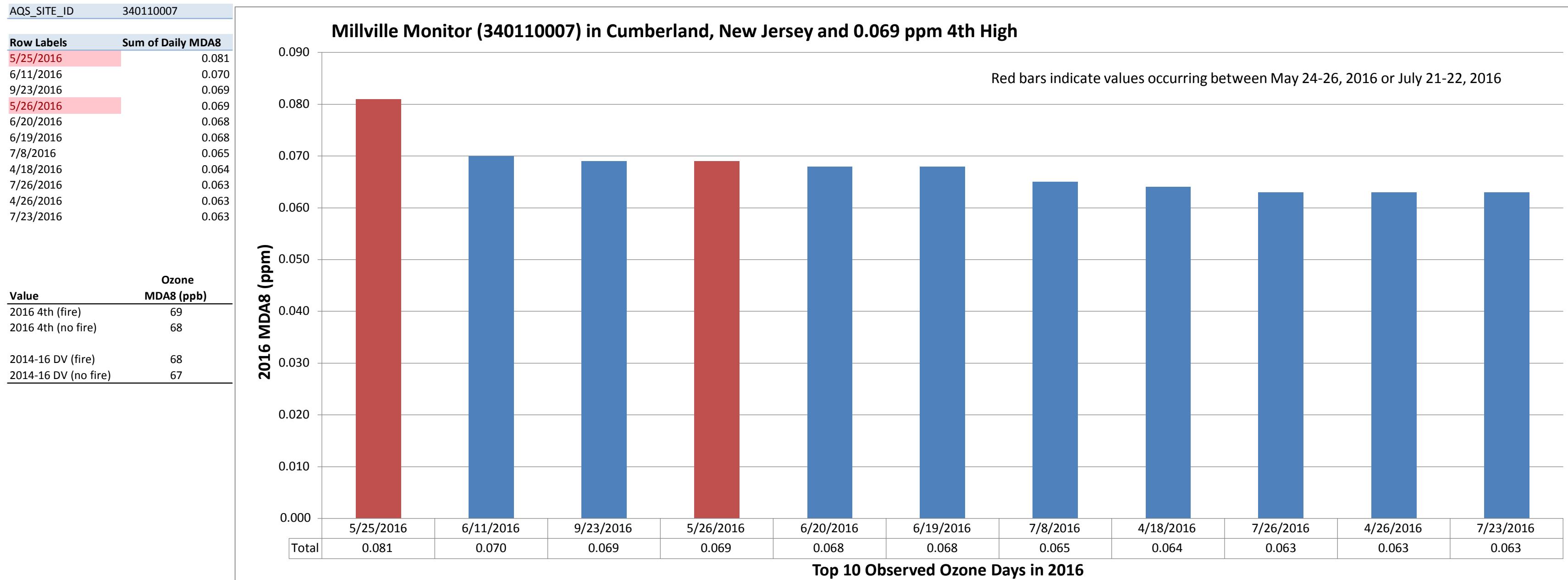


AQS_SITE_ID	340070002
Row Labels	Sum of Daily MDA8
7/22/2016	0.081
5/25/2016	0.078
7/27/2016	0.078
9/23/2016	0.078
6/11/2016	0.076
6/20/2016	0.075
7/8/2016	0.074
8/31/2016	0.072
7/25/2016	0.071
6/17/2016	0.070

Value	Ozone MDA8 (ppb)
2016 4th (fire)	78
2016 4th (no fire)	75
2014-16 DV (fire)	75
2014-16 DV (no fire)	74

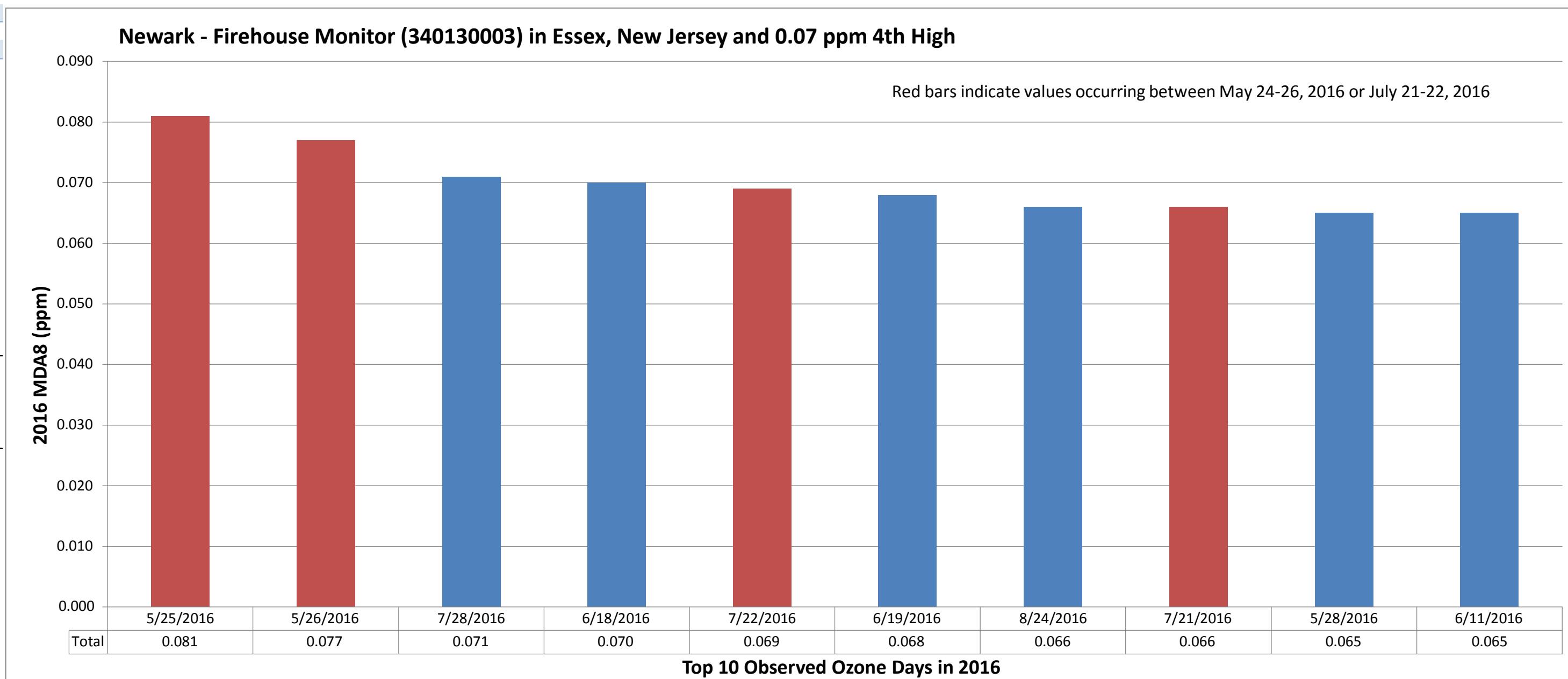


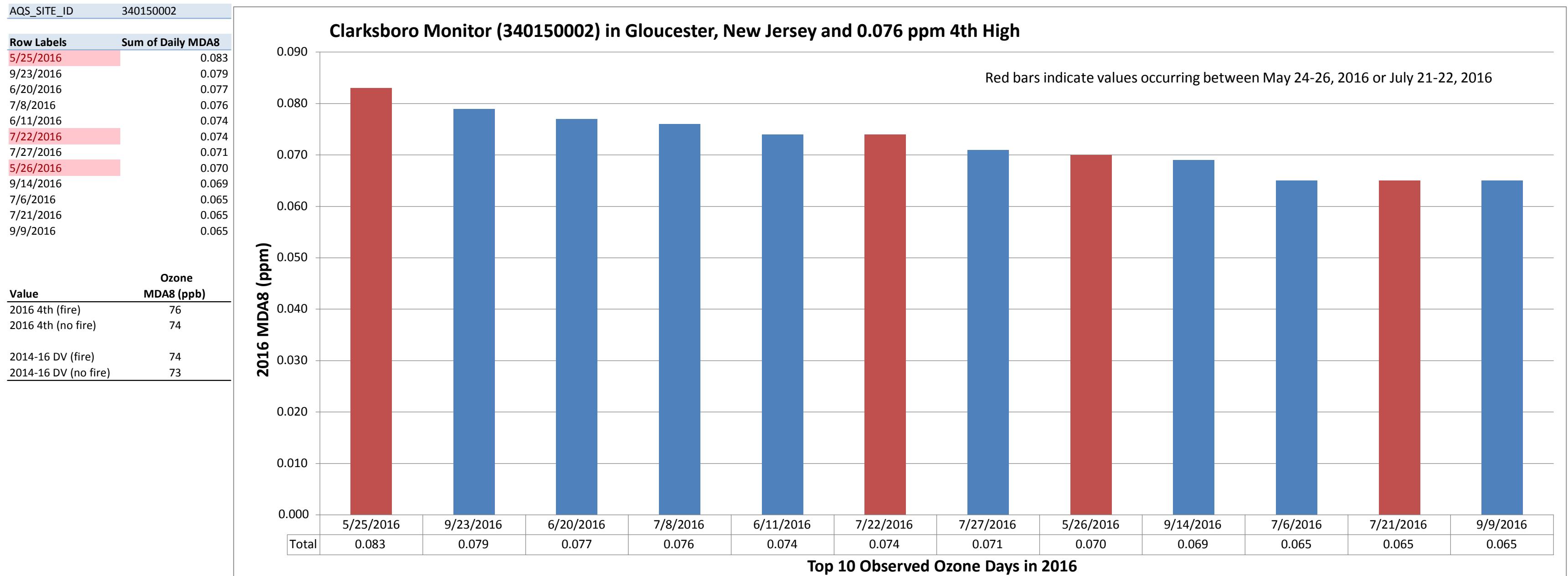




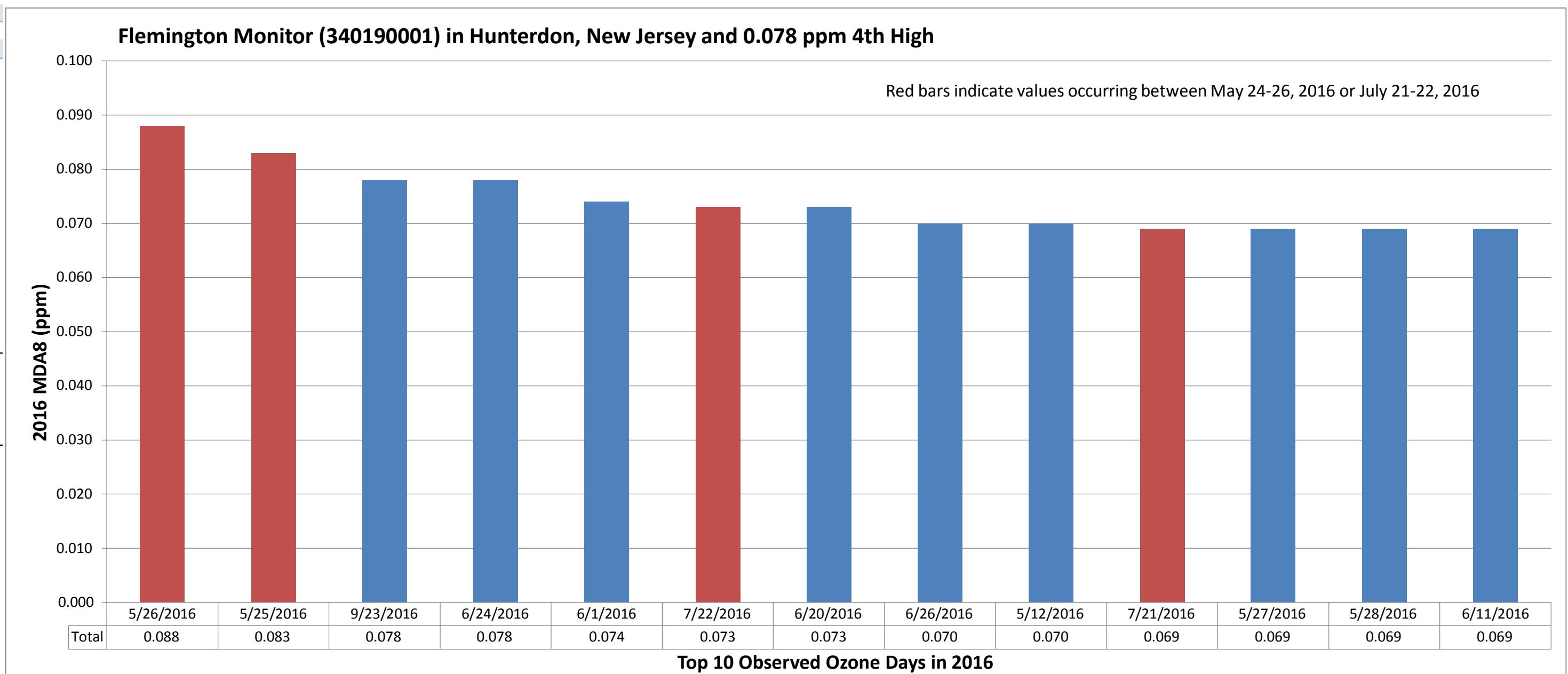
AQS_SITE_ID	340130003
Row Labels	Sum of Daily MDA8
5/25/2016	0.081
5/26/2016	0.077
7/28/2016	0.071
6/18/2016	0.070
7/22/2016	0.069
6/19/2016	0.068
8/24/2016	0.066
7/21/2016	0.066
5/28/2016	0.065
6/11/2016	0.065

Value	Ozone MDA8 (ppb)
2016 4th (fire)	70
2016 4th (no fire)	66
2014-16 DV (fire)	70
2014-16 DV (no fire)	69



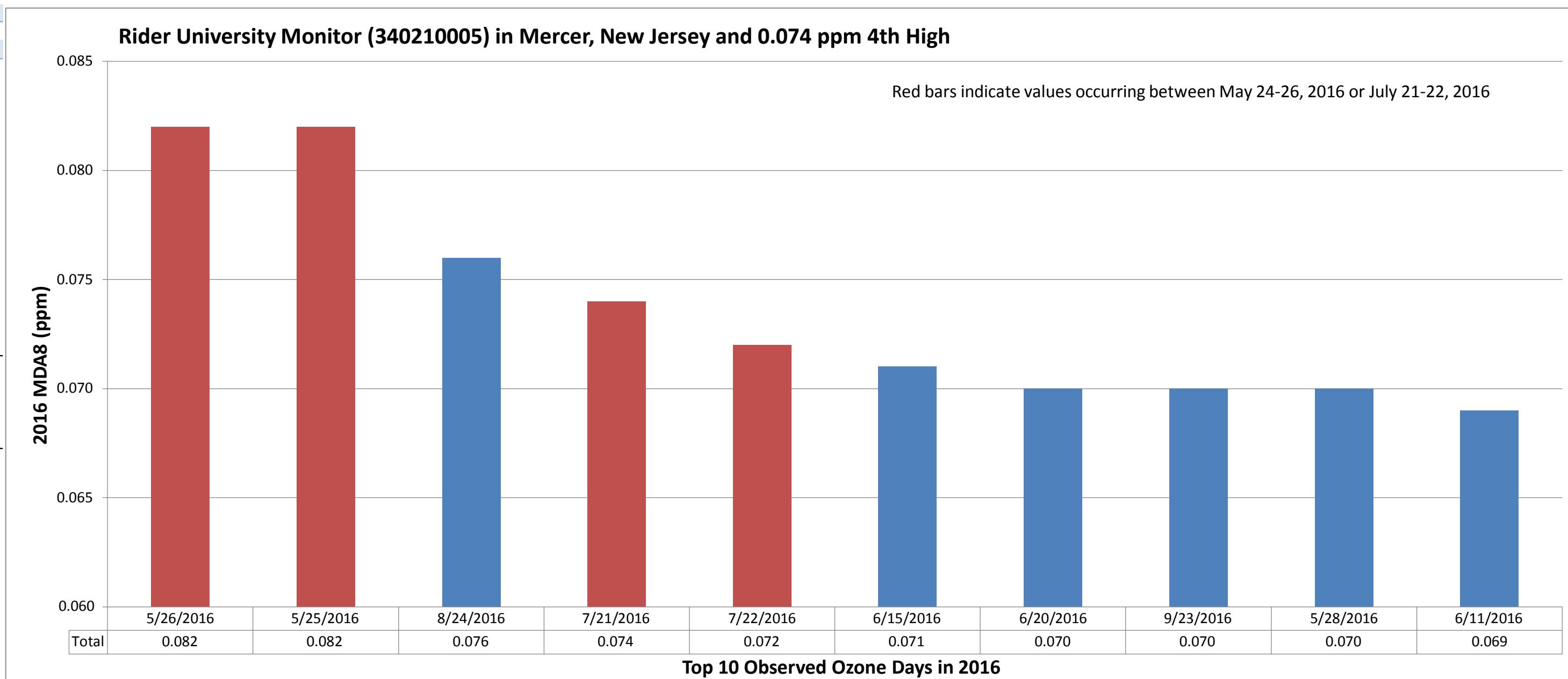


AQS_SITE_ID	340190001
Row Labels	Sum of Daily MDA8
5/26/2016	0.088
5/25/2016	0.083
9/23/2016	0.078
6/24/2016	0.078
6/1/2016	0.074
6/20/2016	0.073
6/26/2016	0.070
5/12/2016	0.070
7/21/2016	0.069
5/27/2016	0.069
5/28/2016	0.069
6/11/2016	0.069
Value	Ozone MDA8 (ppb)
2016 4th (fire)	78
2016 4th (no fire)	73
2014-16 DV (fire)	72
2014-16 DV (no fire)	70



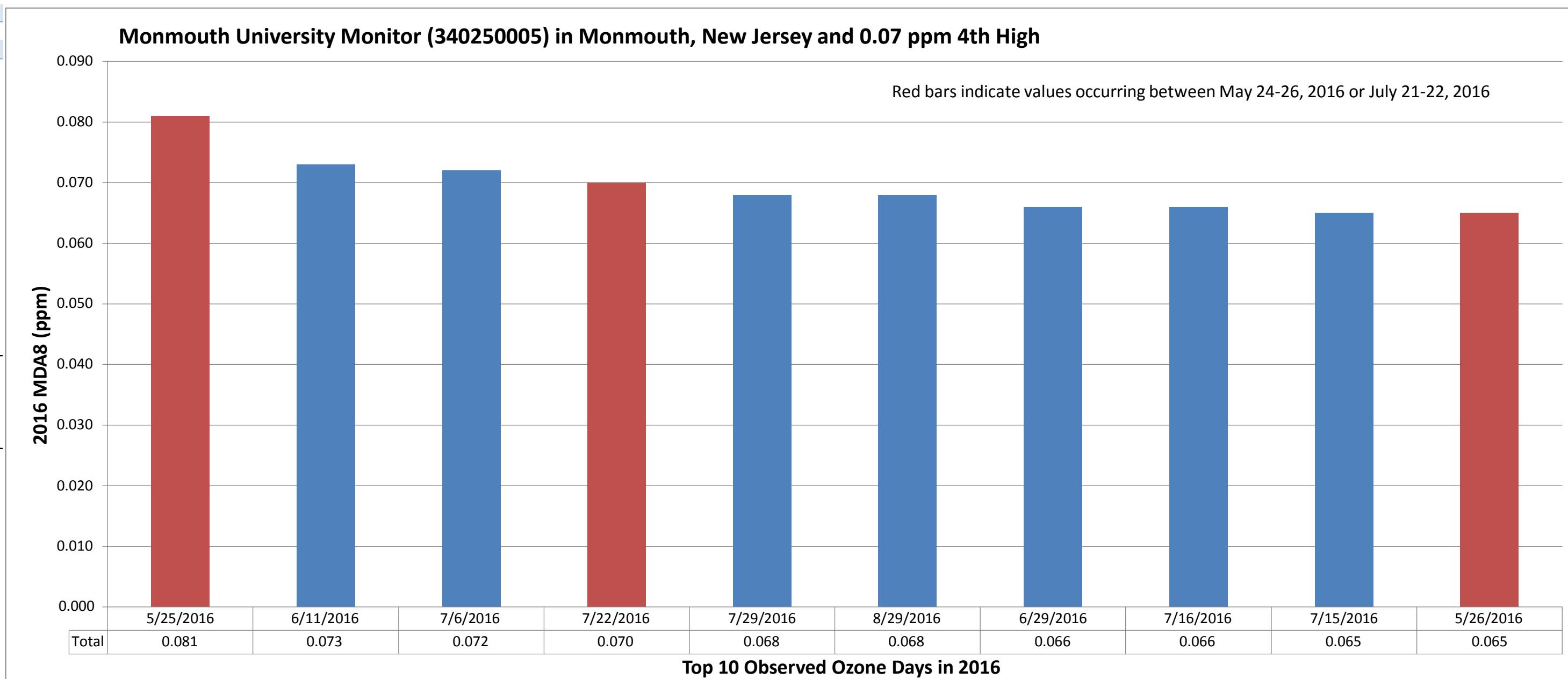
AQS_SITE_ID	340210005
Row Labels	Sum of Daily MDA8
5/26/2016	0.082
5/25/2016	0.082
8/24/2016	0.076
7/21/2016	0.074
7/22/2016	0.072
6/15/2016	0.071
6/20/2016	0.070
9/23/2016	0.070
5/28/2016	0.070
6/11/2016	0.069

Value	Ozone MDA8 (ppb)
2016 4th (fire)	74
2016 4th (no fire)	70
2014-16 DV (fire)	72
2014-16 DV (no fire)	71



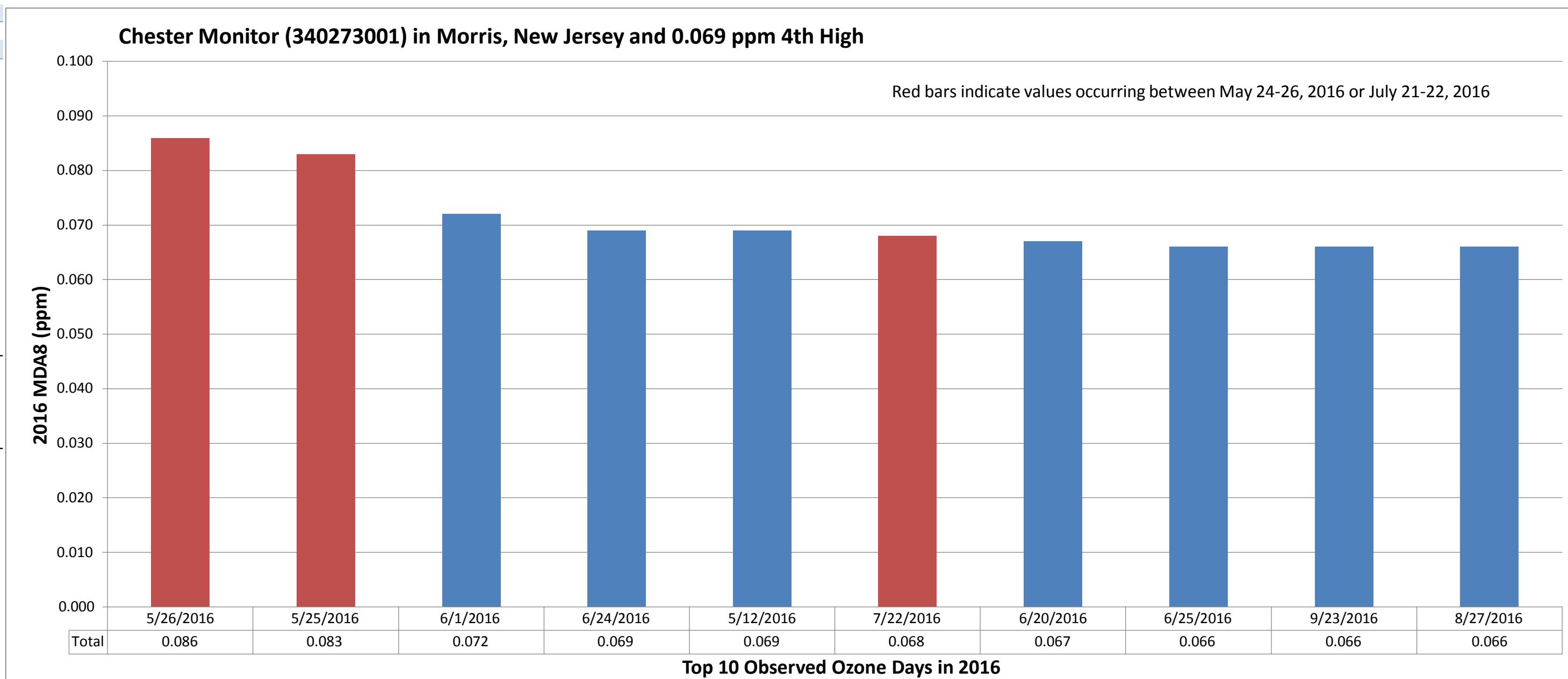
AQS_SITE_ID	340250005
Row Labels	Sum of Daily MDA8
5/25/2016	0.081
6/11/2016	0.073
7/6/2016	0.072
7/22/2016	0.070
7/29/2016	0.068
8/29/2016	0.068
6/29/2016	0.066
7/16/2016	0.066
7/15/2016	0.065
5/26/2016	0.065

Value	Ozone MDA8 (ppb)
2016 4th (fire)	70
2016 4th (no fire)	68
2014-16 DV (fire)	70
2014-16 DV (no fire)	69



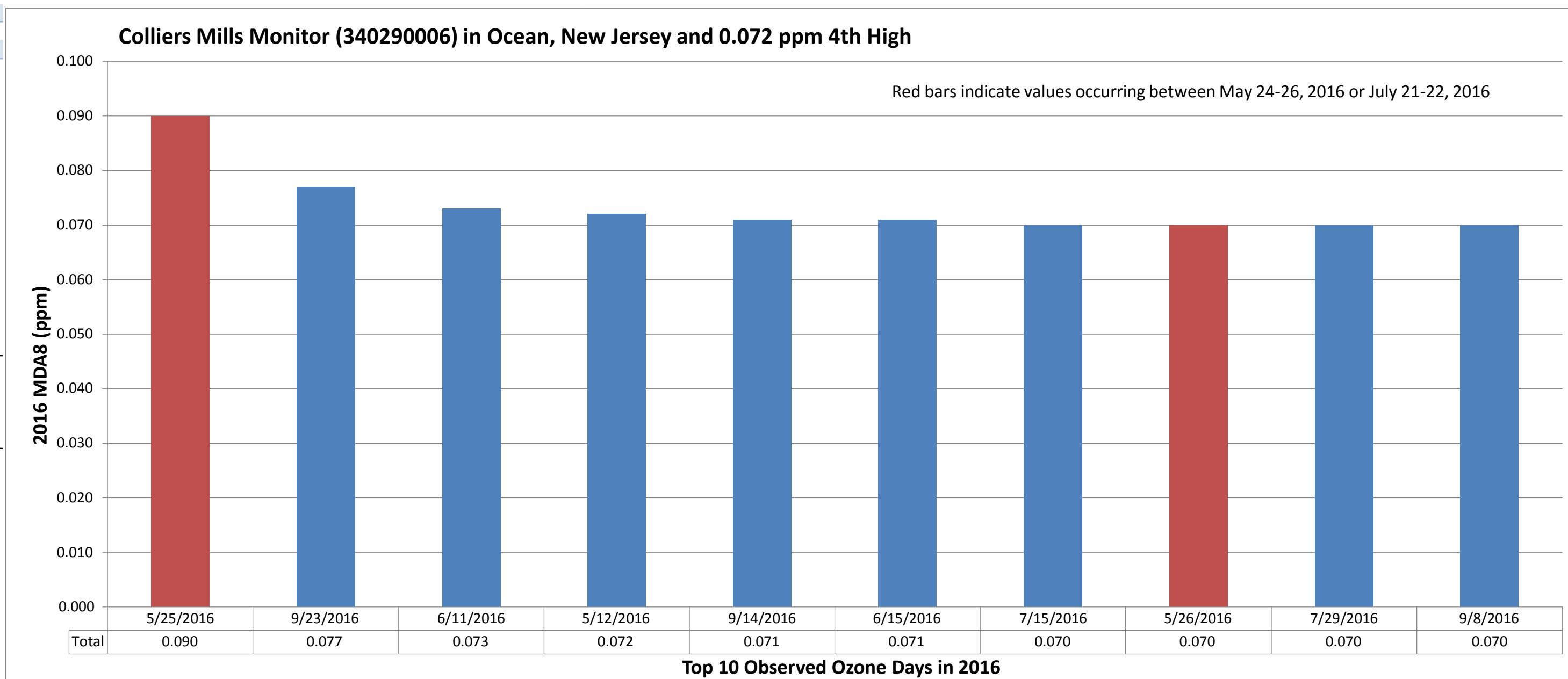
AQS_SITE_ID	340273001
Row Labels	Sum of Daily MDA8
5/26/2016	0.086
5/25/2016	0.083
6/1/2016	0.072
6/24/2016	0.069
5/12/2016	0.069
7/22/2016	0.068
6/20/2016	0.067
6/25/2016	0.066
9/23/2016	0.066
8/27/2016	0.066

Value	Ozone MDA8 (ppb)
2016 4th (fire)	69
2016 4th (no fire)	67
2014-16 DV (fire)	69
2014-16 DV (no fire)	68



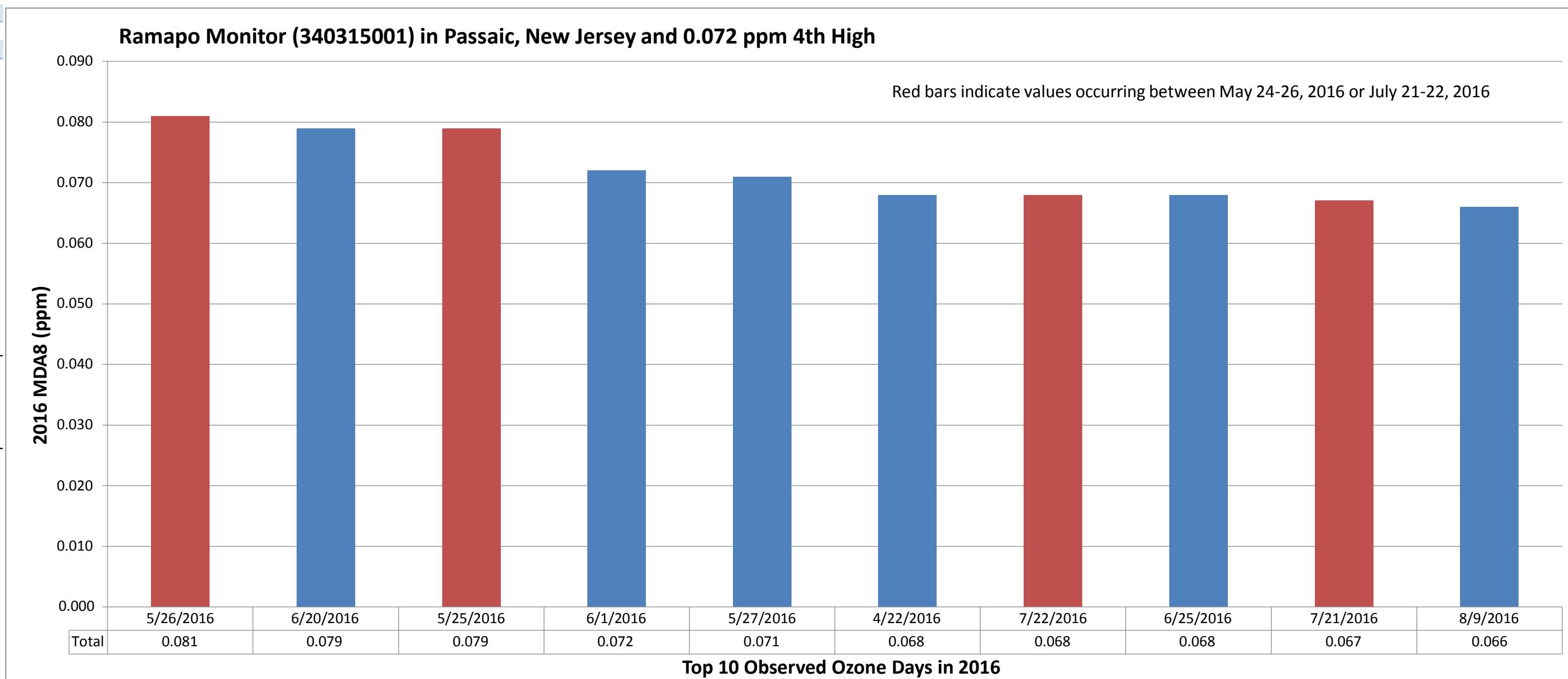
AQS_SITE_ID	340290006
Row Labels	Sum of Daily MDA8
5/25/2016	0.090
9/23/2016	0.077
6/11/2016	0.073
5/12/2016	0.072
9/14/2016	0.071
6/15/2016	0.071
7/15/2016	0.070
5/26/2016	0.070
7/29/2016	0.070
9/8/2016	0.070

Value	Ozone MDA8 (ppb)
2016 4th (fire)	72
2016 4th (no fire)	71
2014-16 DV (fire)	73
2014-16 DV (no fire)	72



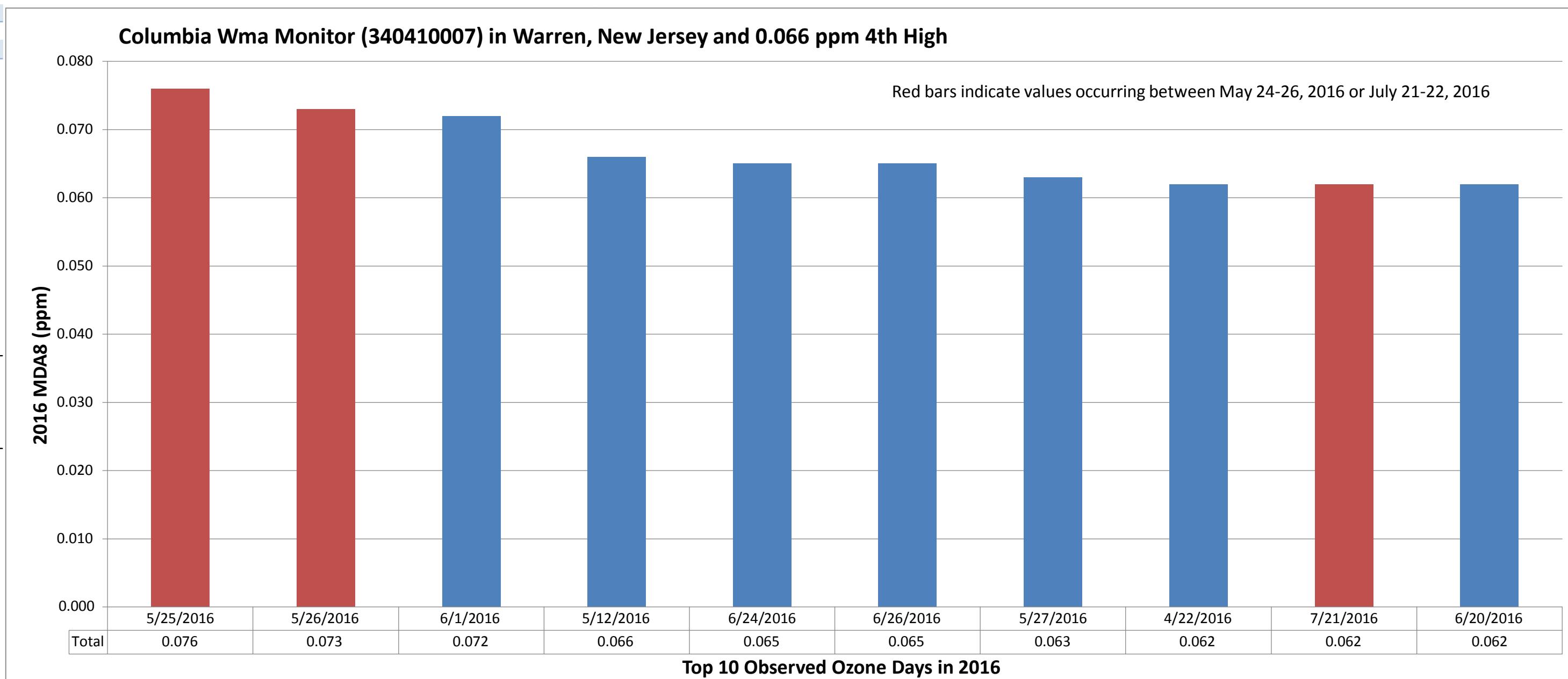
AQS_SITE_ID	340315001
Row Labels	Sum of Daily MDA8
5/26/2016	0.081
6/20/2016	0.079
5/25/2016	0.079
6/1/2016	0.072
5/27/2016	0.071
4/22/2016	0.068
7/22/2016	0.068
6/25/2016	0.068
7/21/2016	0.067
8/9/2016	0.066

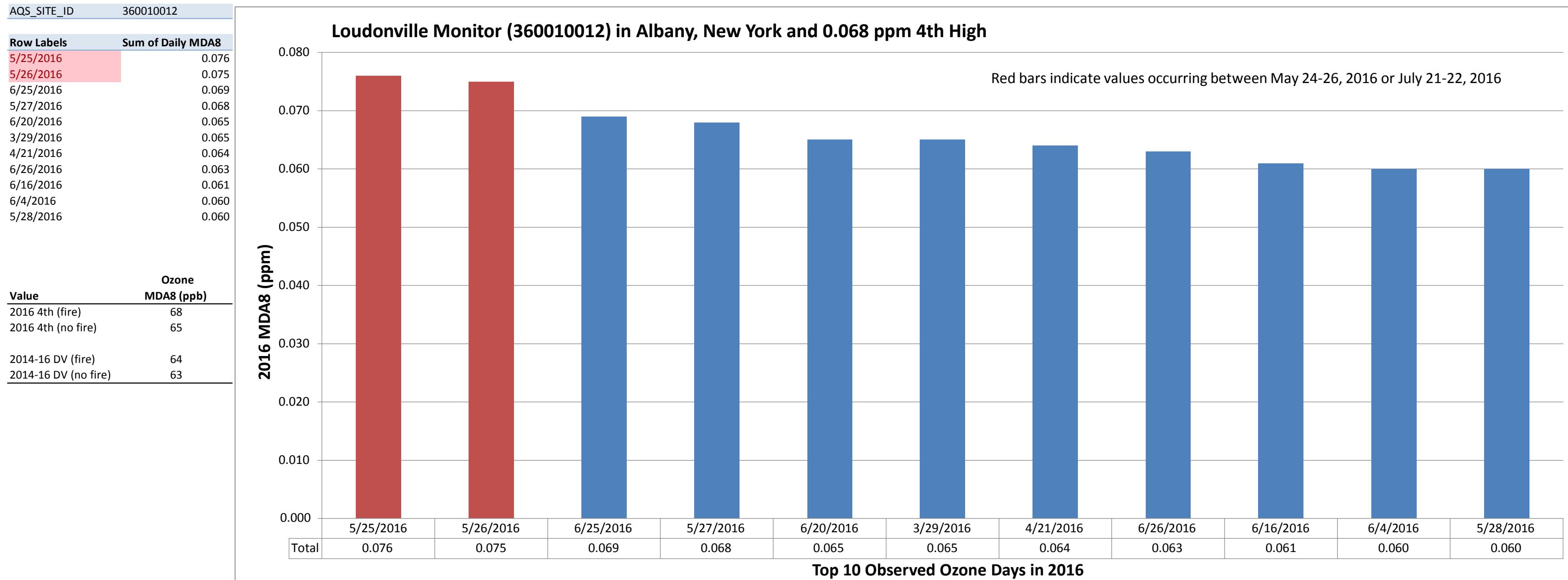
Value	Ozone MDA8 (ppb)
2016 4th (fire)	72
2016 4th (no fire)	68
2014-16 DV (fire)	70
2014-16 DV (no fire)	68



AQS_SITE_ID	340410007
Row Labels	Sum of Daily MDA8
5/25/2016	0.076
5/26/2016	0.073
6/1/2016	0.072
5/12/2016	0.066
6/24/2016	0.065
6/26/2016	0.065
5/27/2016	0.063
4/22/2016	0.062
7/21/2016	0.062
6/20/2016	0.062

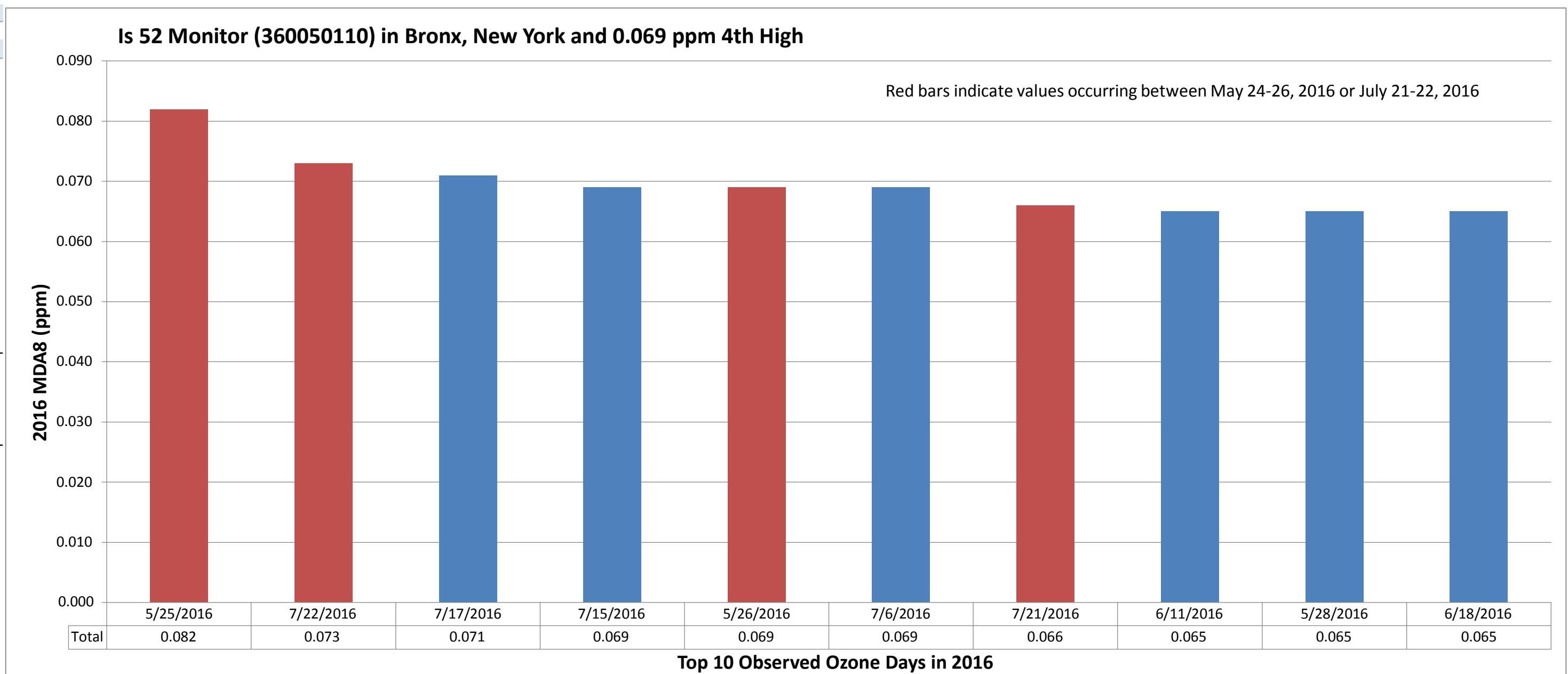
Value	Ozone MDA8 (ppb)
2016 4th (fire)	66
2016 4th (no fire)	65
2014-16 DV (fire)	64
2014-16 DV (no fire)	63





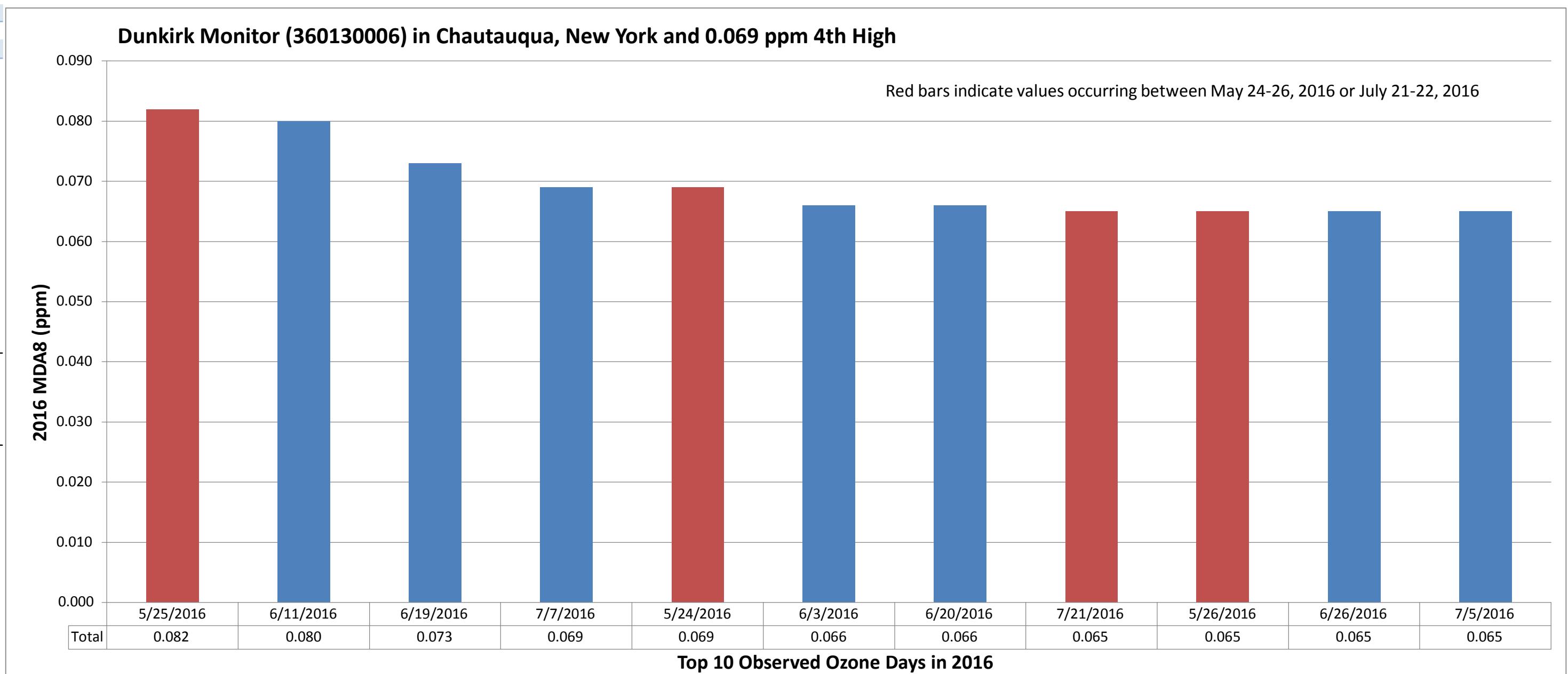
AQS_SITE_ID	360050110
Row Labels	Sum of Daily MDA8
5/25/2016	0.082
7/22/2016	0.073
7/17/2016	0.071
7/15/2016	0.069
5/26/2016	0.069
7/6/2016	0.069
7/21/2016	0.066
6/11/2016	0.065
5/28/2016	0.065
6/18/2016	0.065

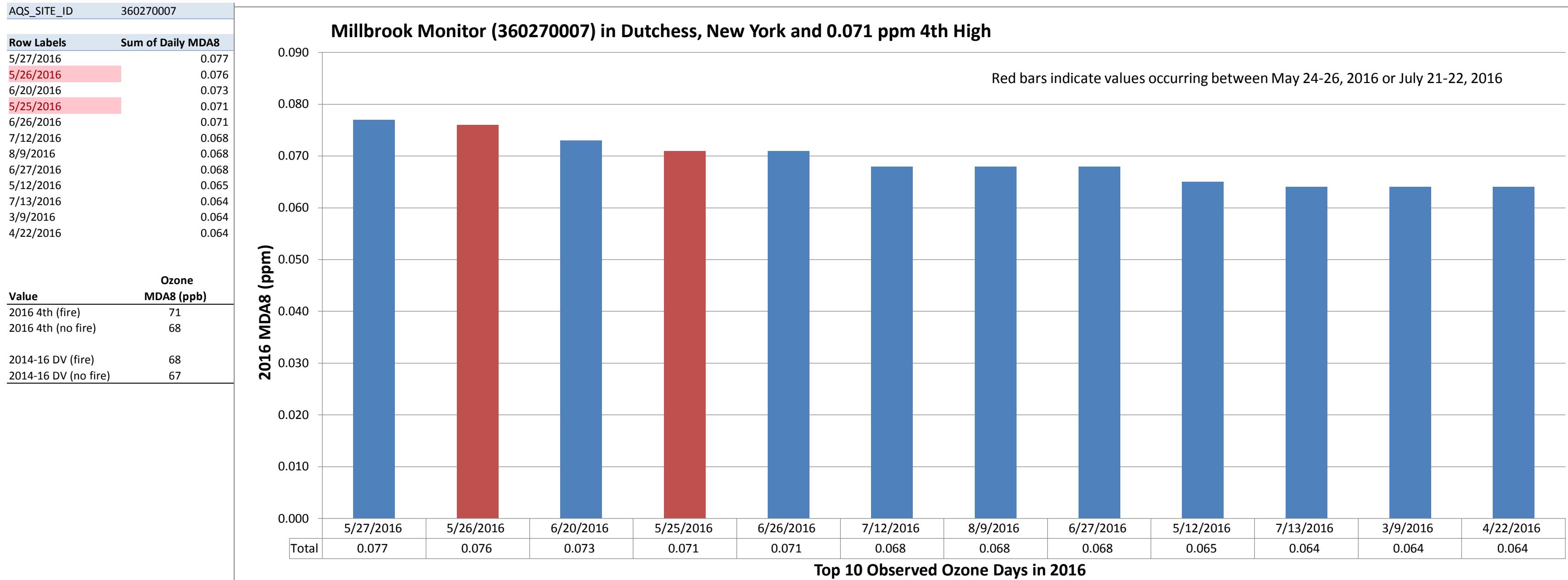
Value	Ozone MDA8 (ppb)
2016 4th (fire)	69
2016 4th (no fire)	65
2014-16 DV (fire)	67
2014-16 DV (no fire)	66



AQS_SITE_ID	360130006
Row Labels	Sum of Daily MDA8
5/25/2016	0.082
6/11/2016	0.080
6/19/2016	0.073
7/7/2016	0.069
5/24/2016	0.069
6/3/2016	0.066
6/20/2016	0.066
7/21/2016	0.065
5/26/2016	0.065
6/26/2016	0.065
7/5/2016	0.065

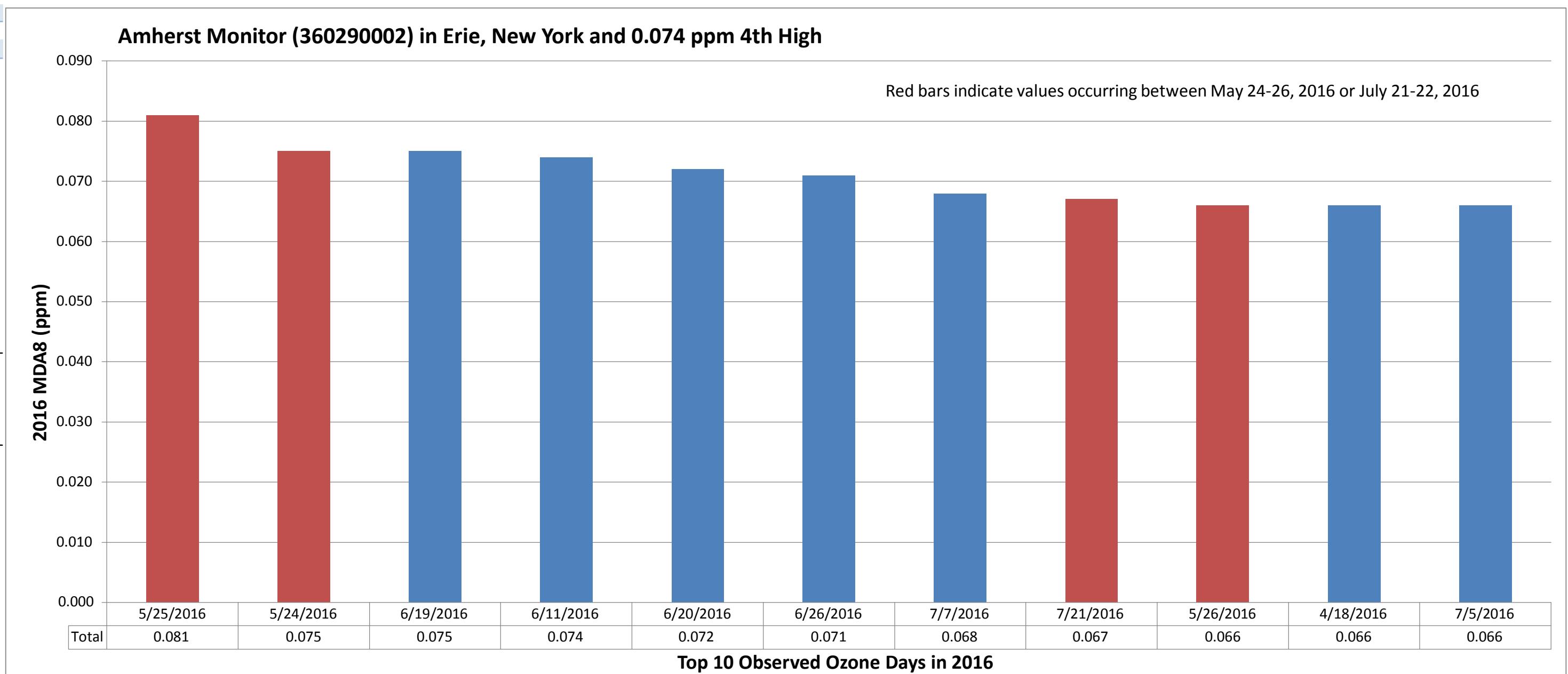
Value	Ozone MDA8 (ppb)
2016 4th (fire)	69
2016 4th (no fire)	66
2014-16 DV (fire)	68
2014-16 DV (no fire)	67

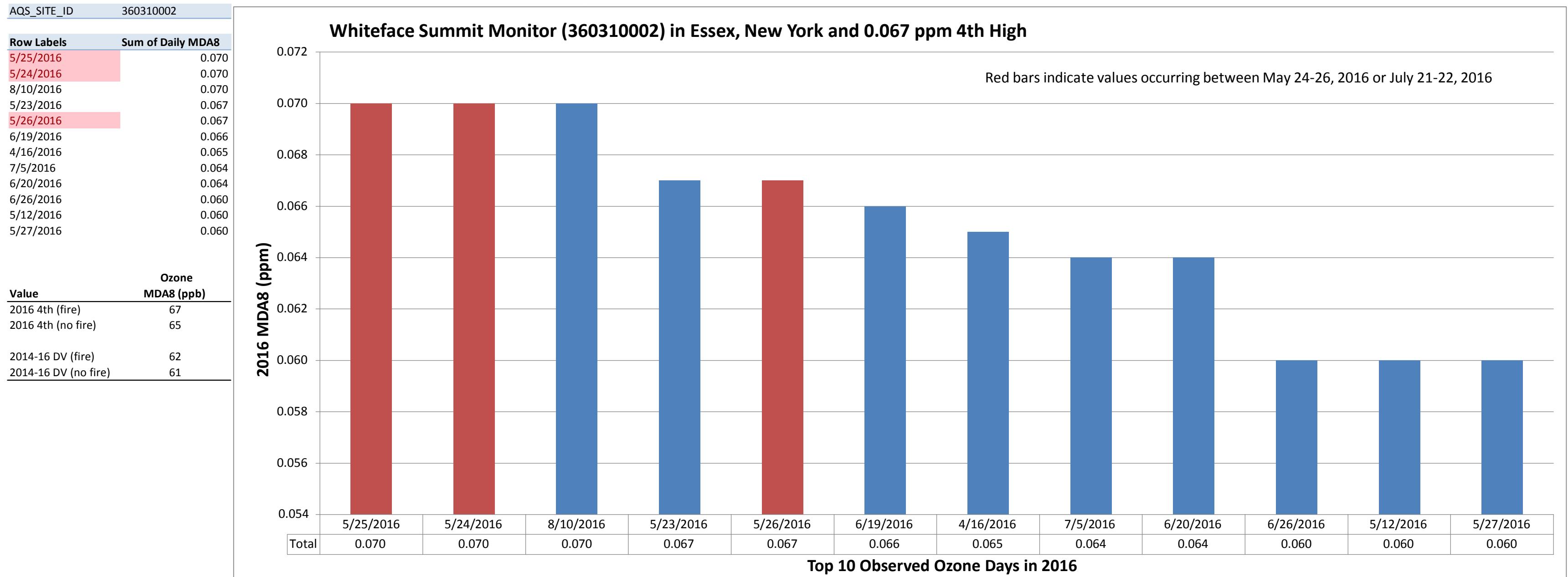


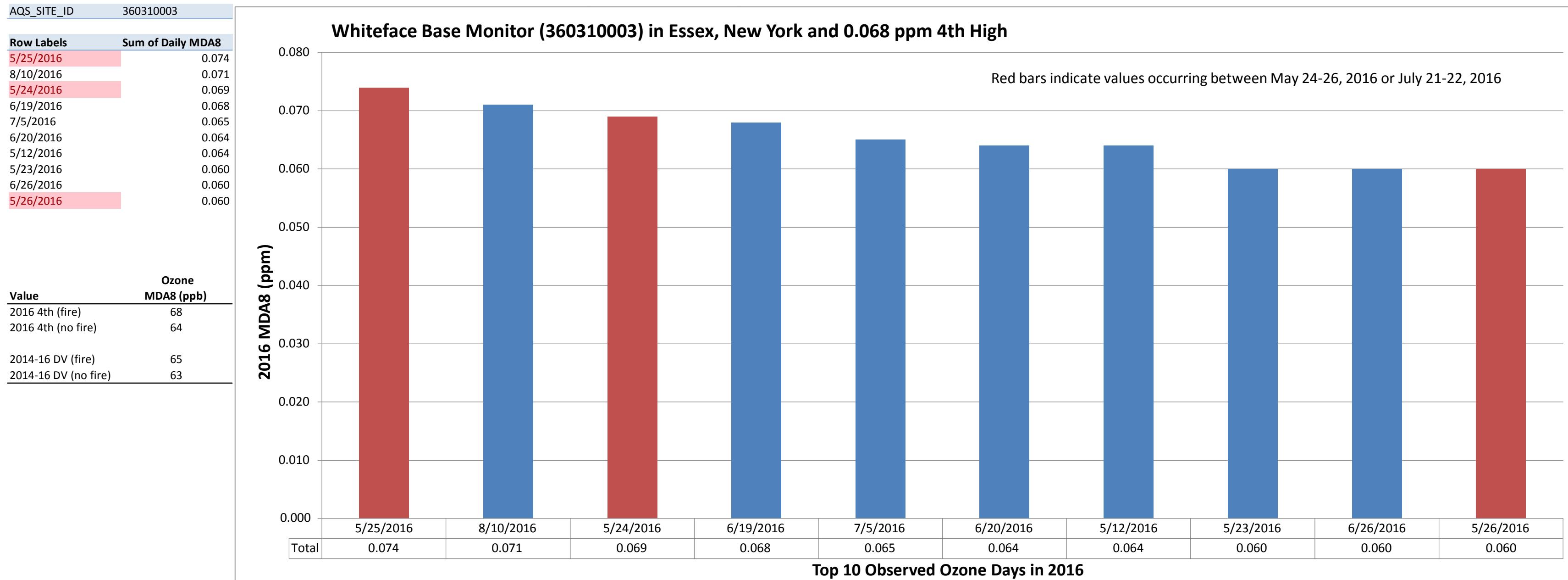


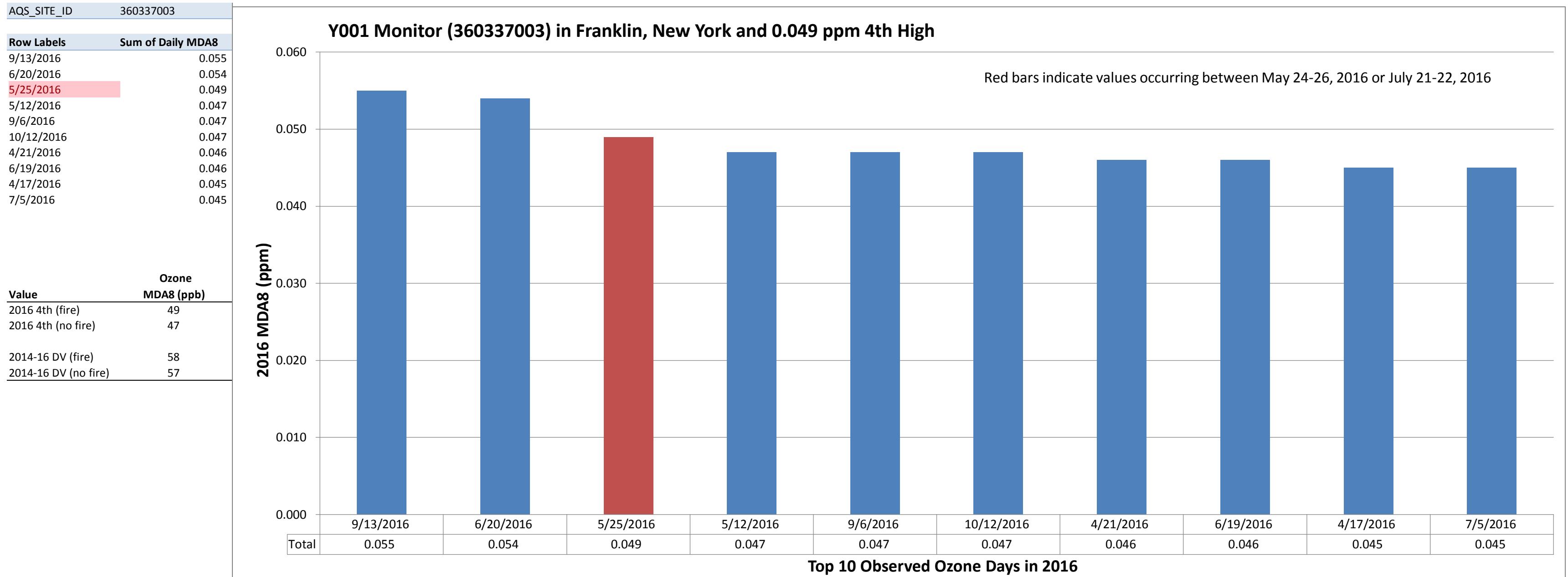
AQS_SITE_ID	360290002
Row Labels	Sum of Daily MDA8
5/25/2016	0.081
5/24/2016	0.075
6/19/2016	0.075
6/11/2016	0.074
6/20/2016	0.072
6/26/2016	0.071
7/7/2016	0.068
7/21/2016	0.067
5/26/2016	0.066
4/18/2016	0.066
7/5/2016	0.066

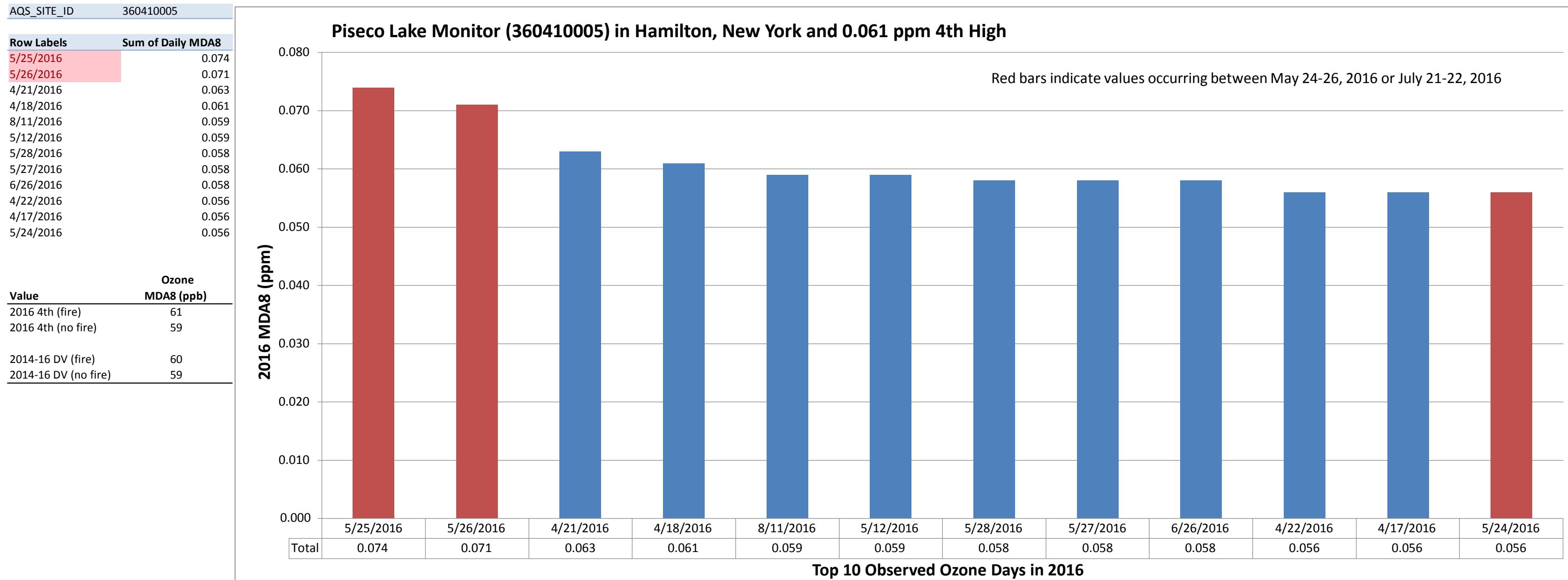
Value	Ozone MDA8 (ppb)
2016 4th (fire)	74
2016 4th (no fire)	71
2014-16 DV (fire)	69
2014-16 DV (no fire)	68

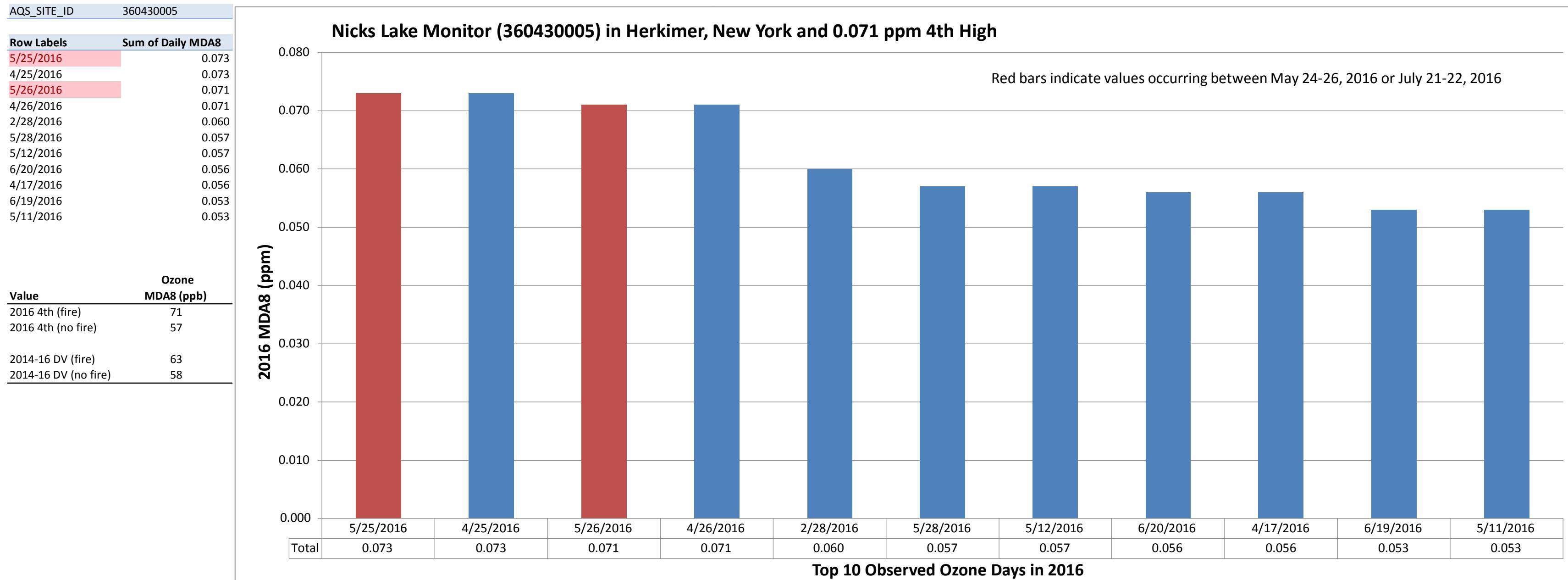






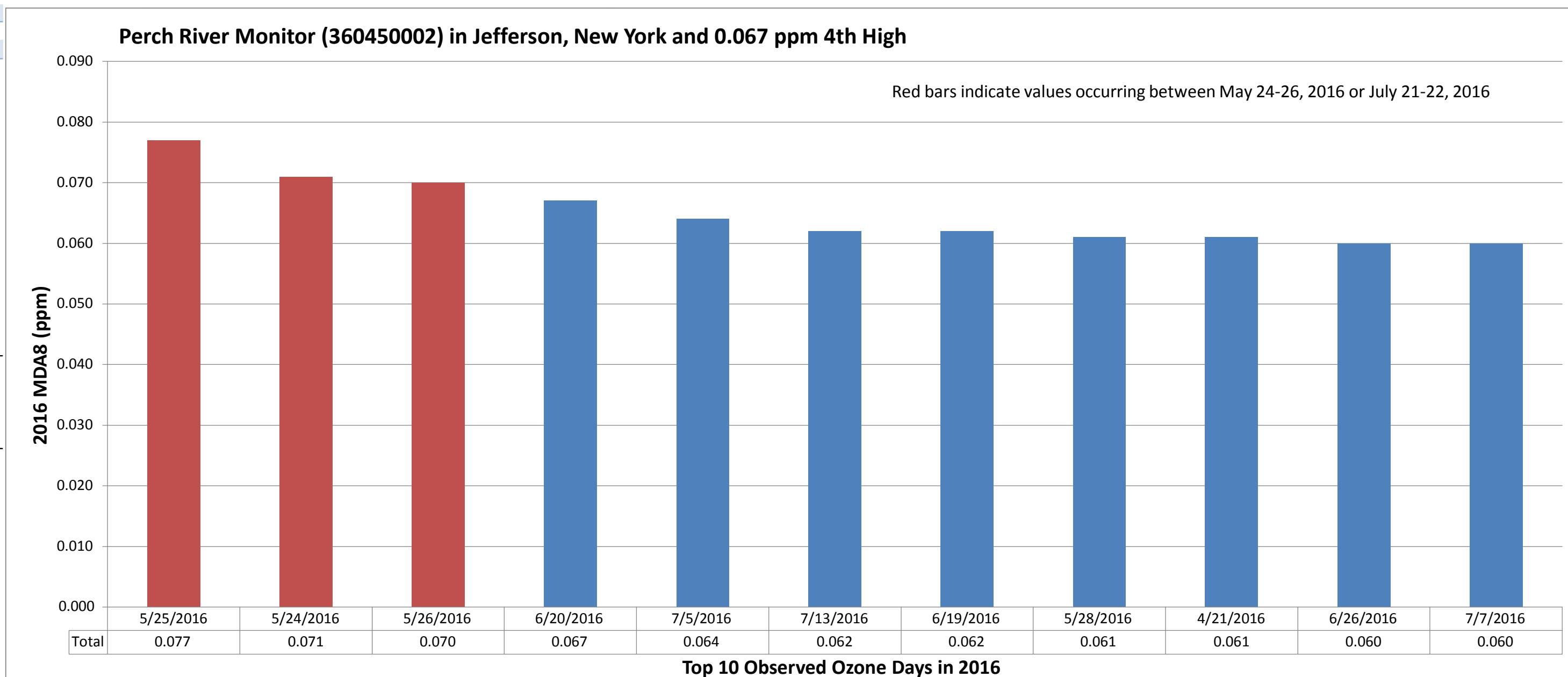


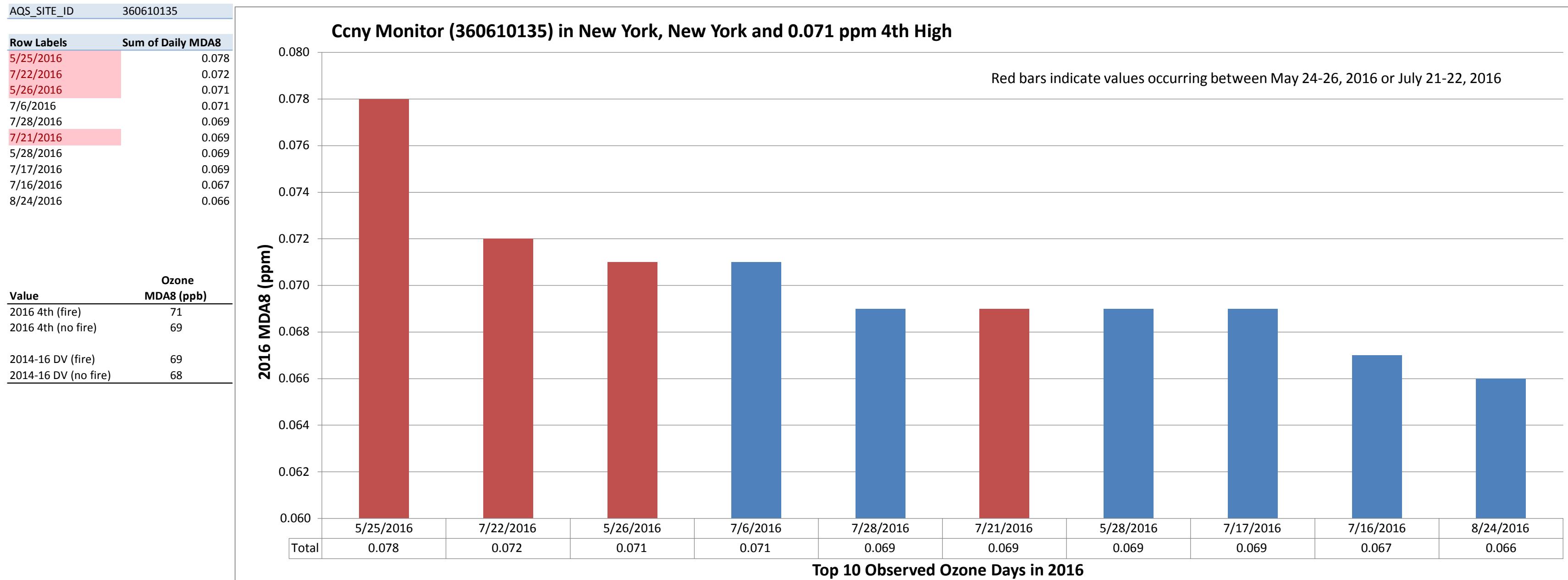


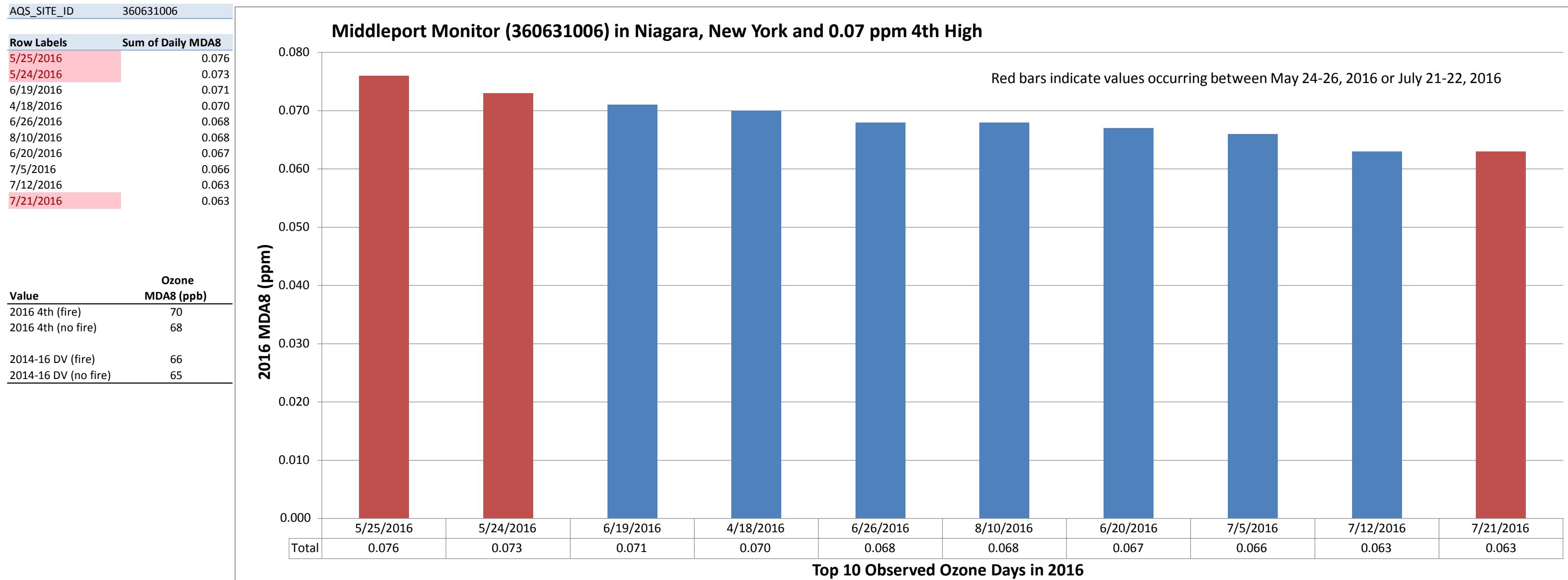


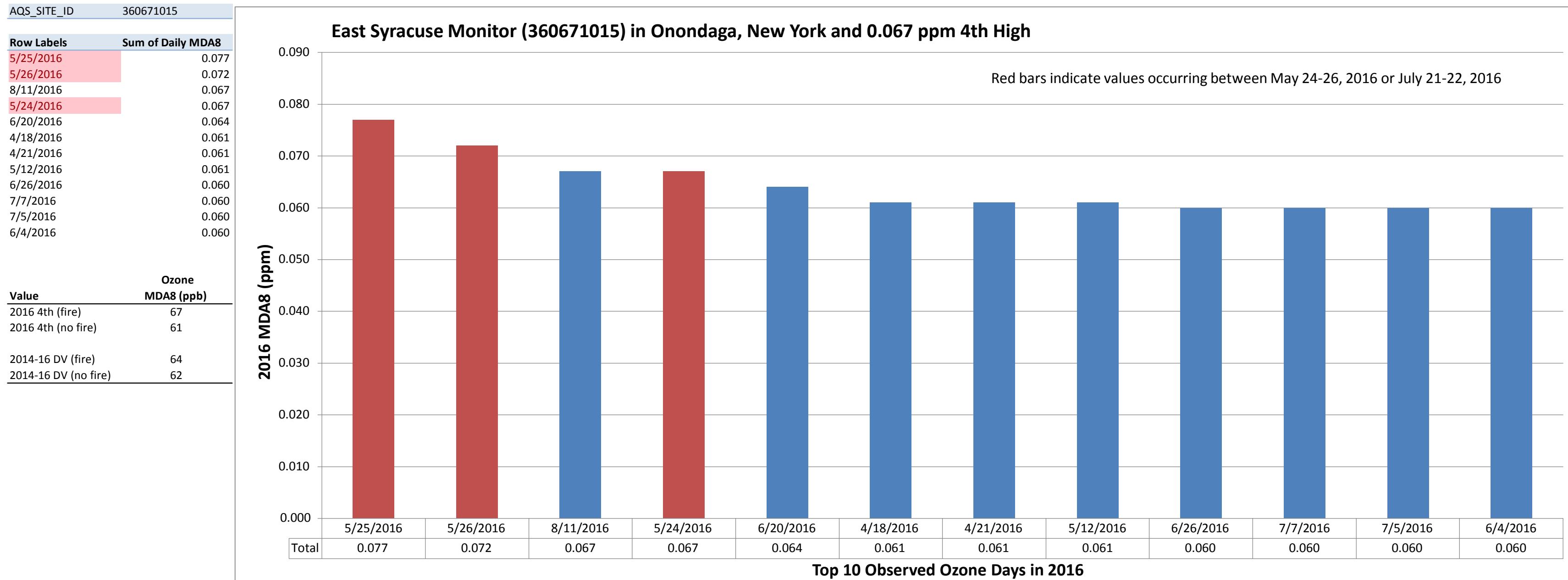
AQS_SITE_ID	360450002
Row Labels	Sum of Daily MDA8
5/25/2016	0.077
5/24/2016	0.071
5/26/2016	0.070
6/20/2016	0.067
7/5/2016	0.064
7/13/2016	0.062
6/19/2016	0.062
5/28/2016	0.061
4/21/2016	0.061
6/26/2016	0.060
7/7/2016	0.060

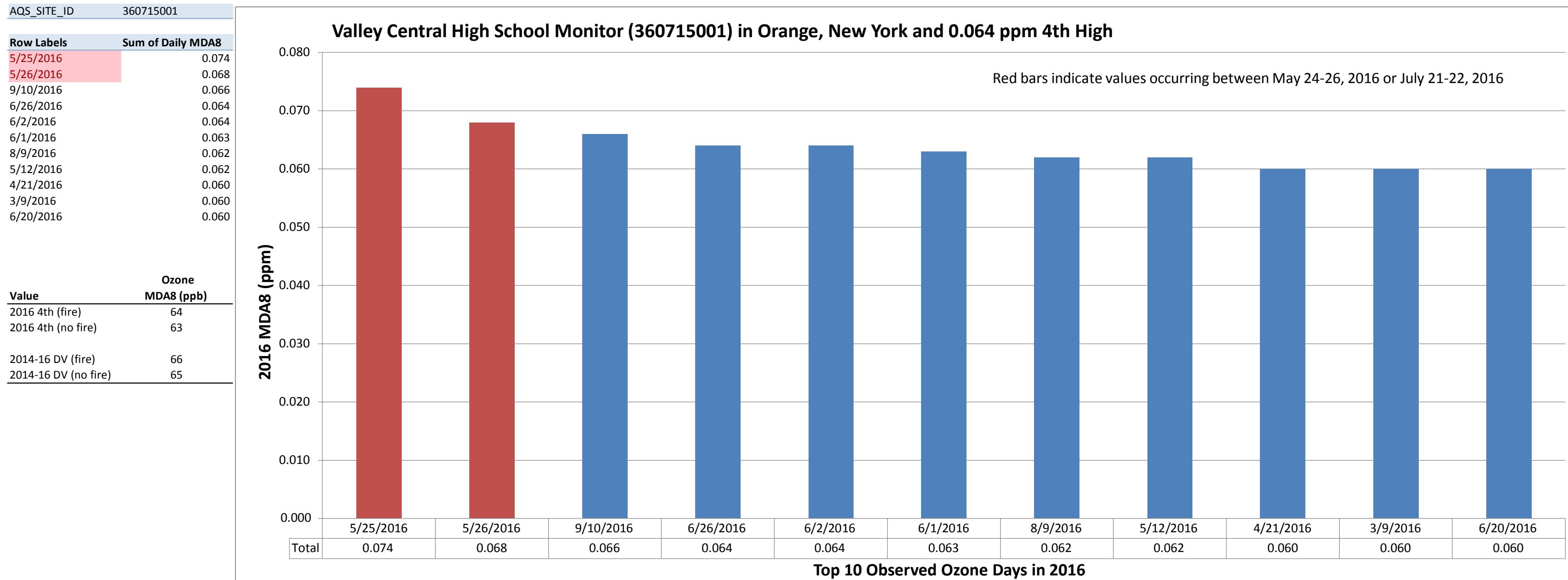
Value	Ozone MDA8 (ppb)
2016 4th (fire)	67
2016 4th (no fire)	62
2014-16 DV (fire)	63
2014-16 DV (no fire)	62





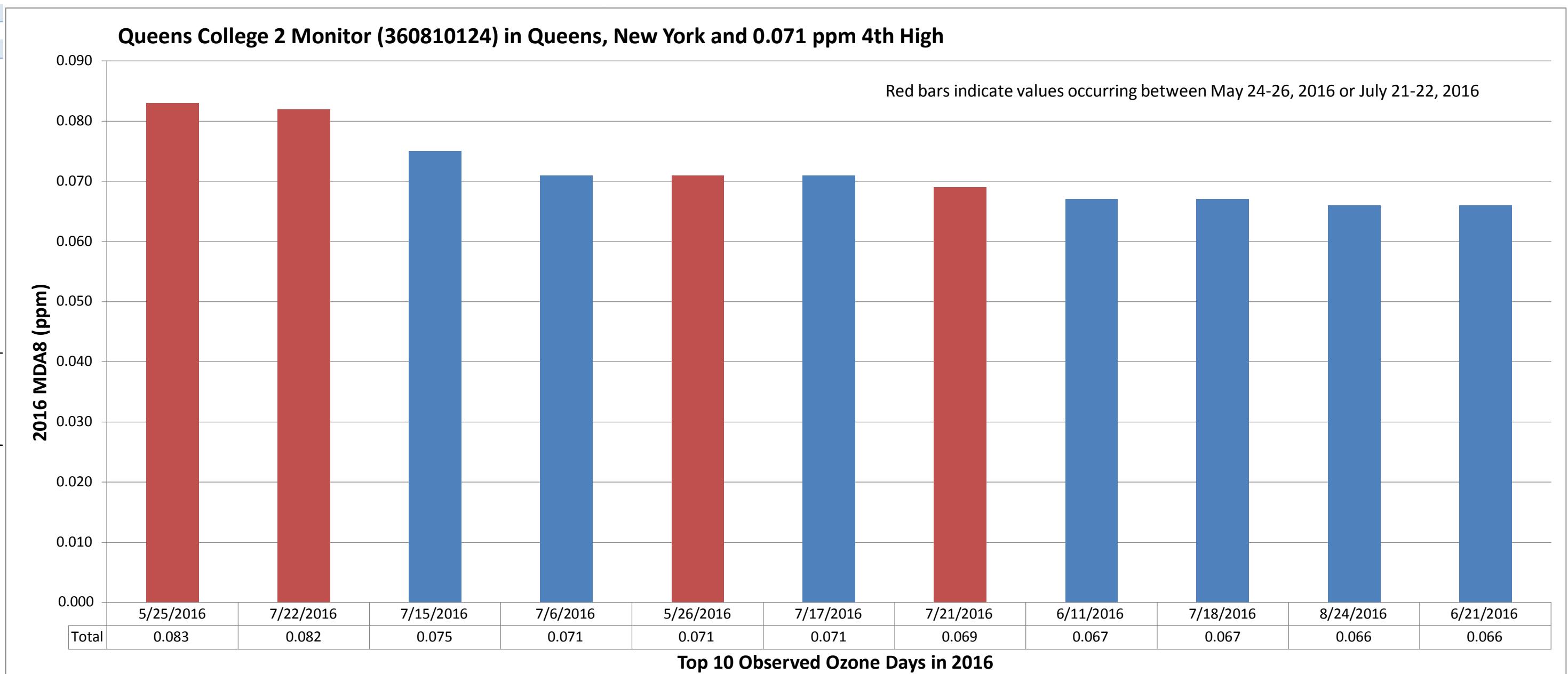






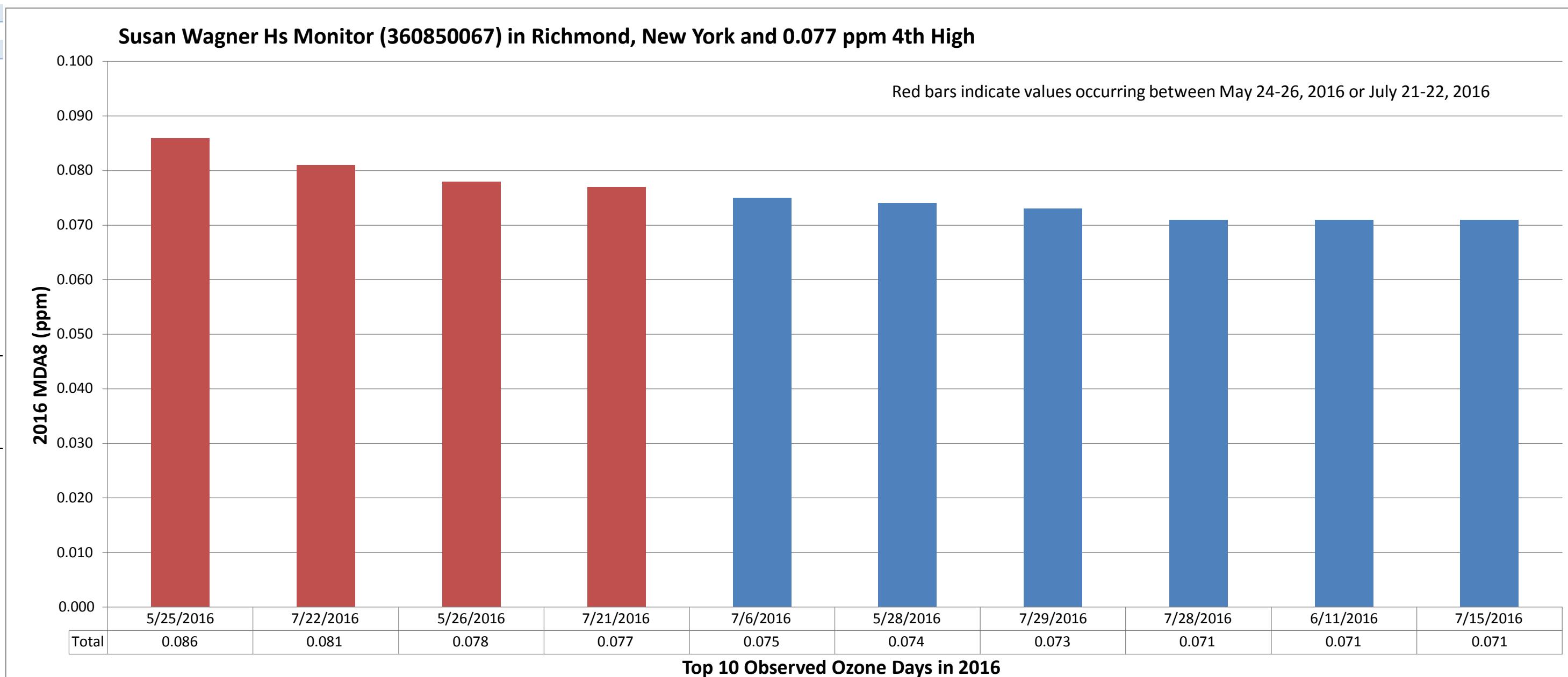
AQS_SITE_ID	360810124
Row Labels	Sum of Daily MDA8
5/25/2016	0.083
7/22/2016	0.082
7/15/2016	0.075
7/6/2016	0.071
5/26/2016	0.071
7/17/2016	0.071
7/21/2016	0.069
6/11/2016	0.067
7/18/2016	0.067
8/24/2016	0.066
6/21/2016	0.066

Value	Ozone MDA8 (ppb)
2016 4th (fire)	71
2016 4th (no fire)	67
2014-16 DV (fire)	69
2014-16 DV (no fire)	67



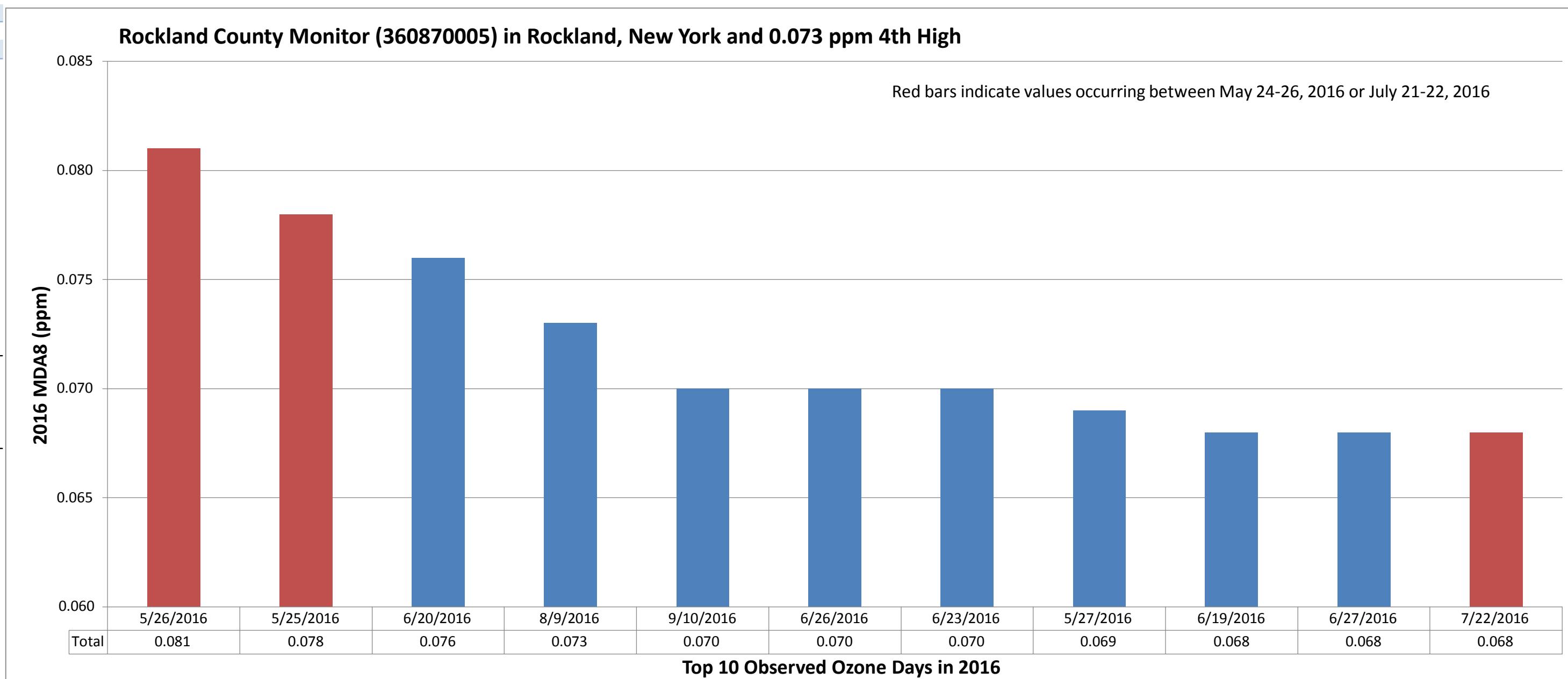
AQS_SITE_ID	360850067
Row Labels	Sum of Daily MDA8
5/25/2016	0.086
7/22/2016	0.081
5/26/2016	0.078
7/21/2016	0.077
7/6/2016	0.075
5/28/2016	0.074
7/29/2016	0.073
7/28/2016	0.071
6/11/2016	0.071
7/15/2016	0.071

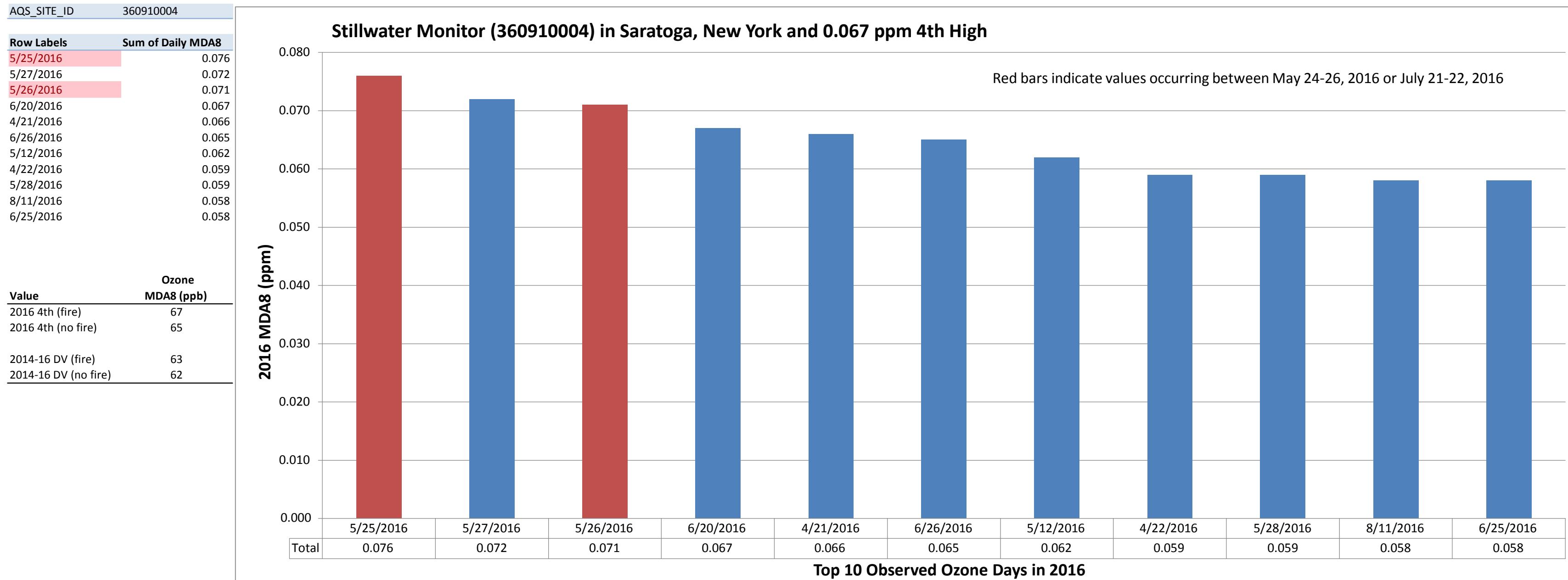
Value	Ozone MDA8 (ppb)
2016 4th (fire)	77
2016 4th (no fire)	71
2014-16 DV (fire)	76
2014-16 DV (no fire)	74

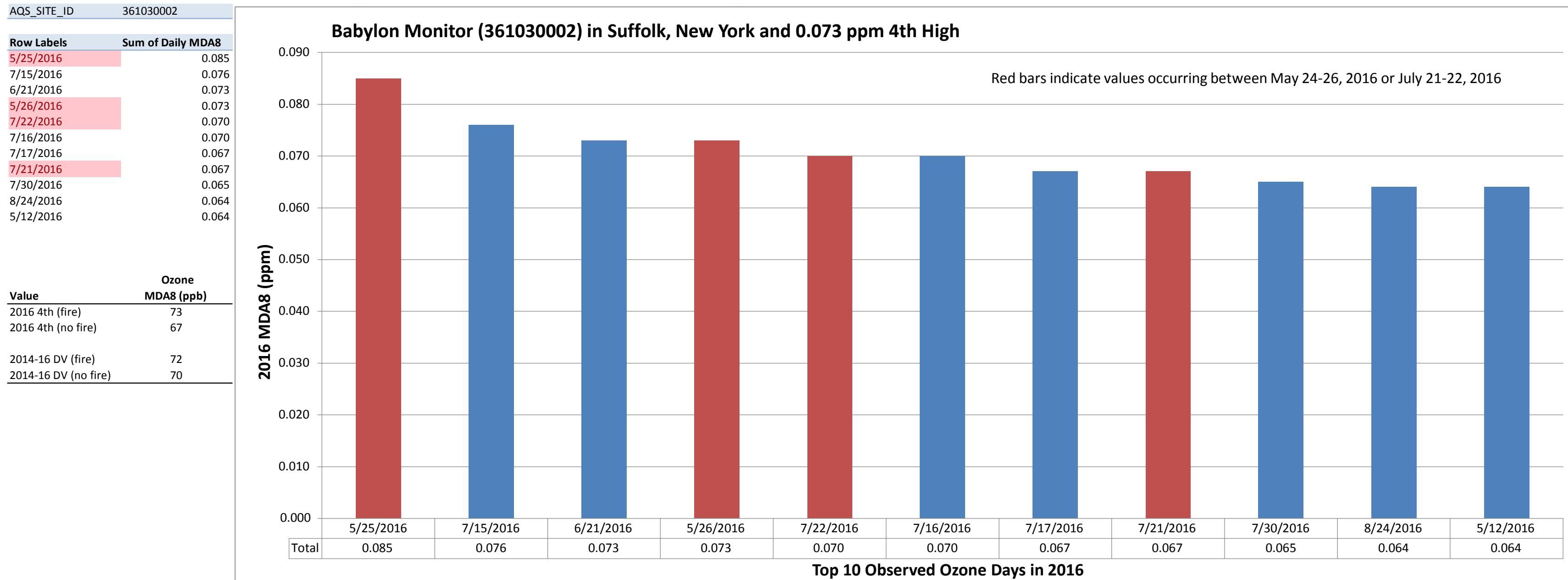


AQS_SITE_ID	360870005
Row Labels	Sum of Daily MDA8
5/26/2016	0.081
5/25/2016	0.078
6/20/2016	0.076
8/9/2016	0.073
9/10/2016	0.070
6/26/2016	0.070
6/23/2016	0.070
5/27/2016	0.069
6/19/2016	0.068
6/27/2016	0.068
7/22/2016	0.068

Value	Ozone MDA8 (ppb)
2016 4th (fire)	73
2016 4th (no fire)	70
2014-16 DV (fire)	72
2014-16 DV (no fire)	71

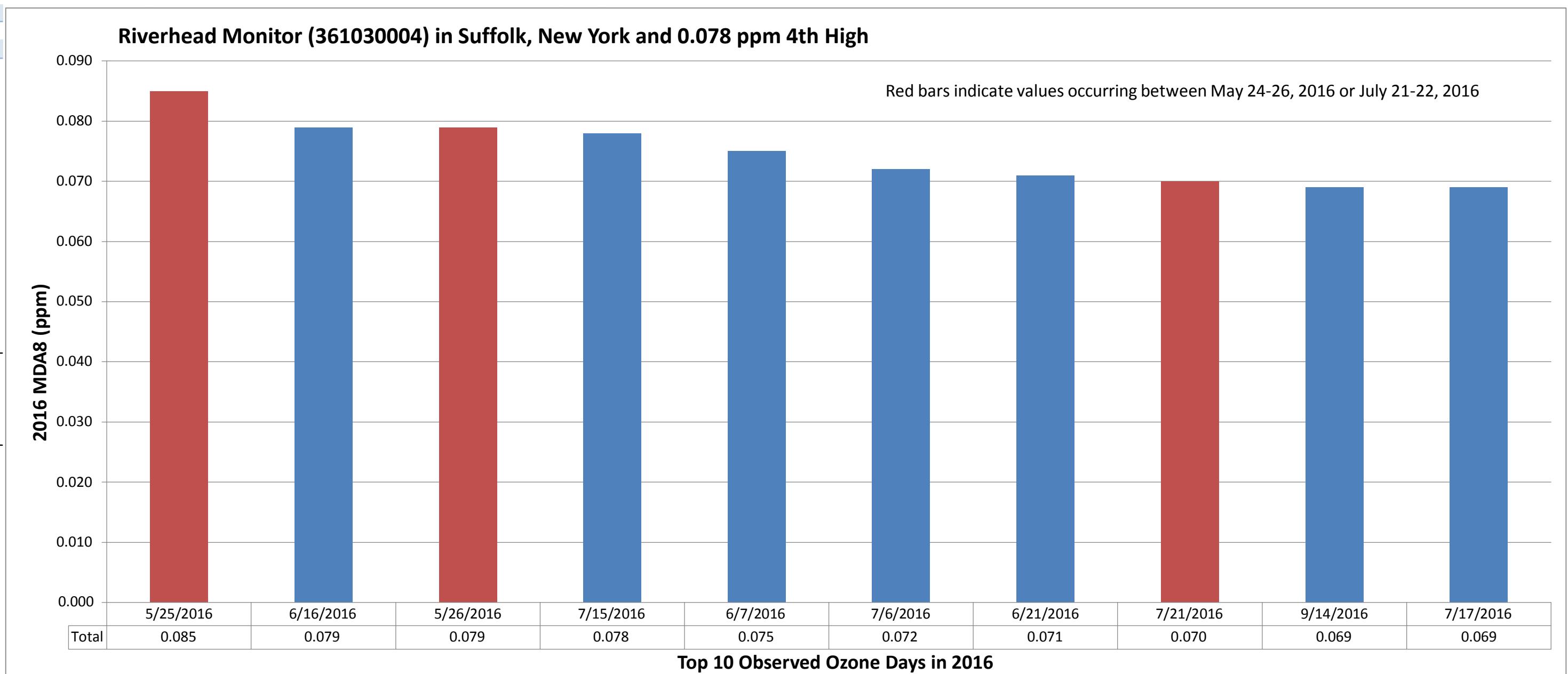


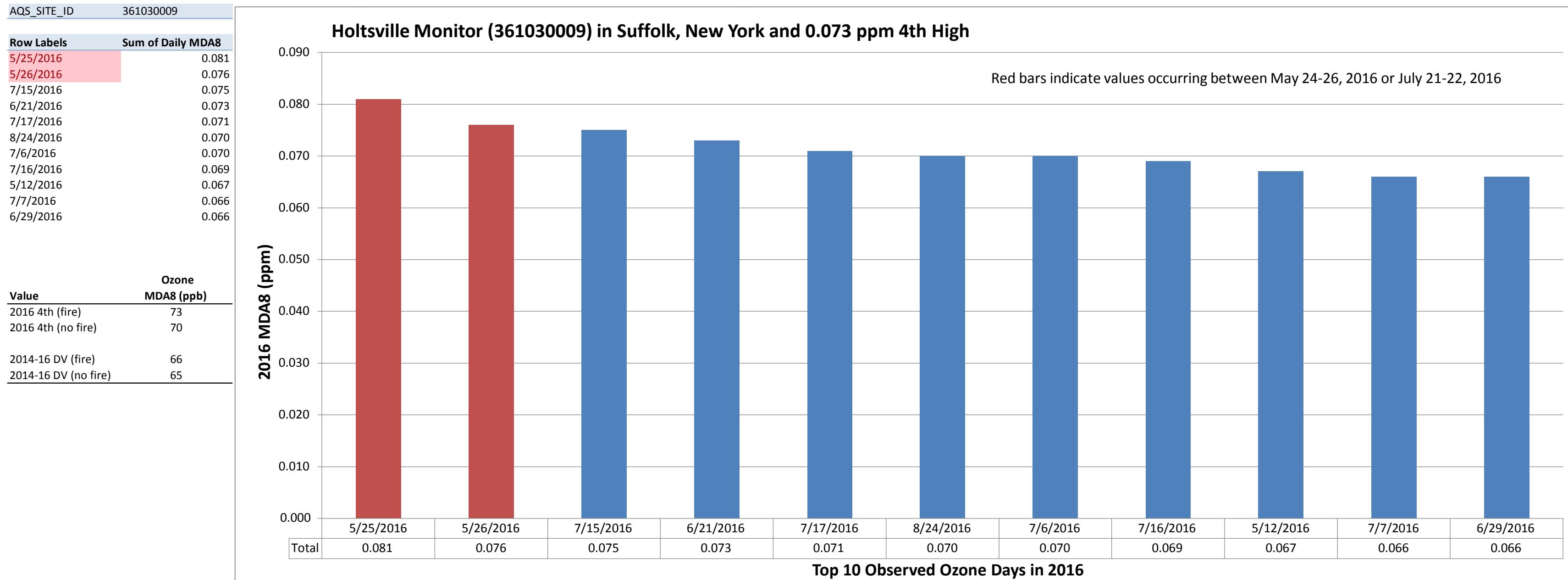


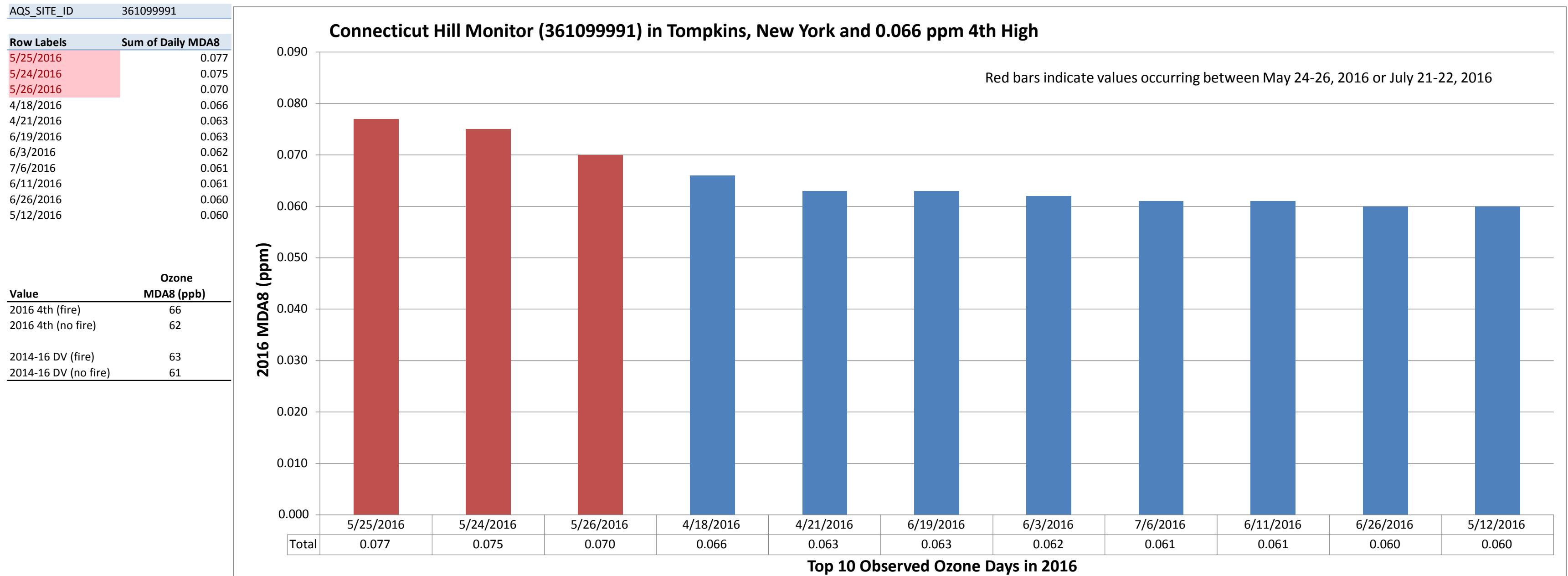


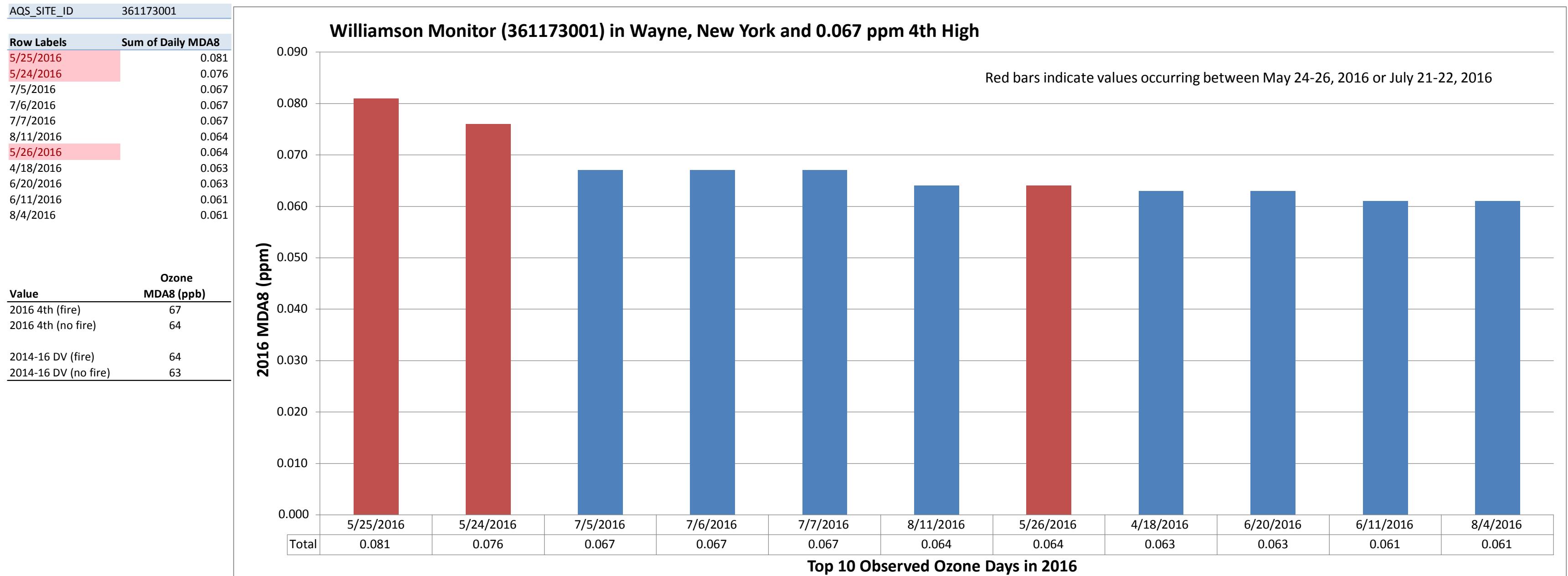
AQS_SITE_ID	361030004
Row Labels	Sum of Daily MDA8
5/25/2016	0.085
6/16/2016	0.079
5/26/2016	0.079
7/15/2016	0.078
6/7/2016	0.075
7/6/2016	0.072
6/21/2016	0.071
7/21/2016	0.070
9/14/2016	0.069
7/17/2016	0.069

Value	Ozone MDA8 (ppb)
2016 4th (fire)	78
2016 4th (no fire)	72
2014-16 DV (fire)	72
2014-16 DV (no fire)	70



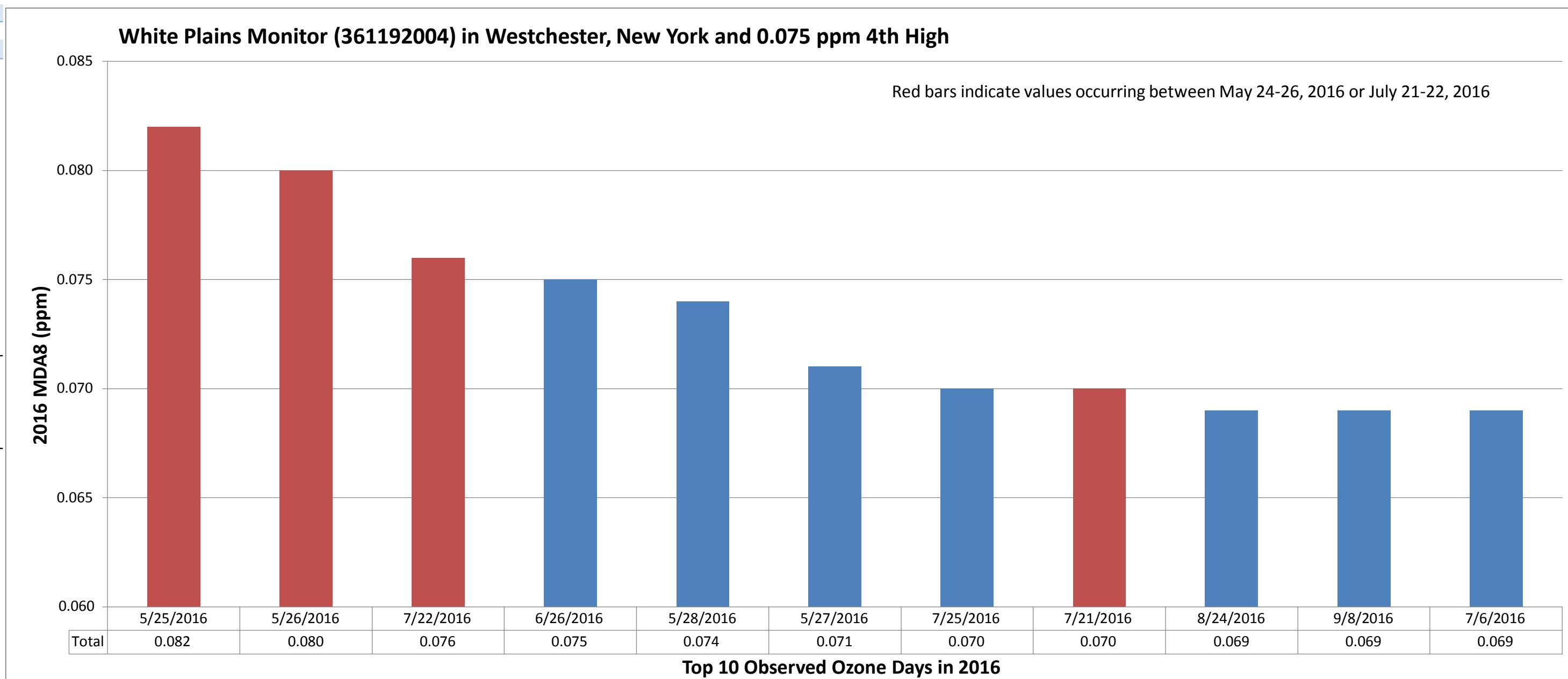






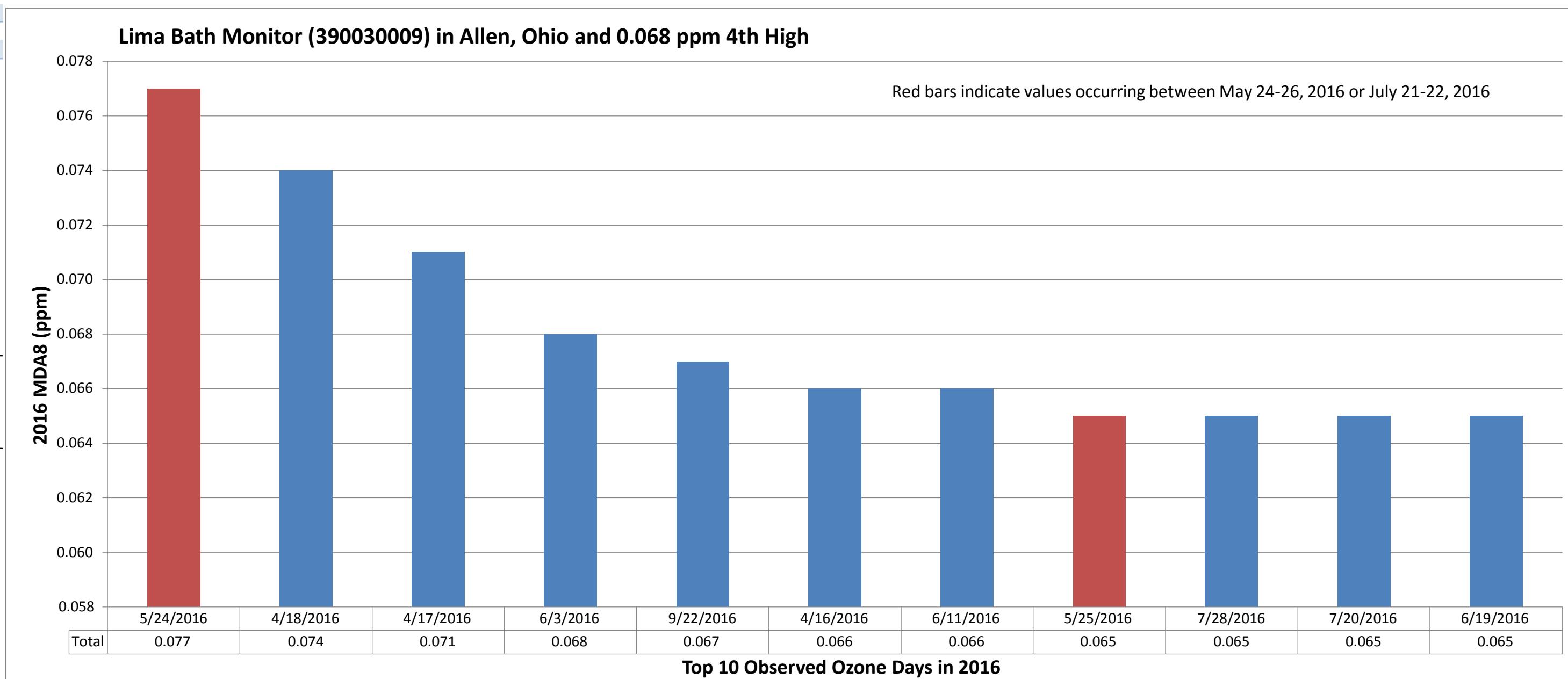
AQS_SITE_ID	361192004
Row Labels	Sum of Daily MDA8
5/25/2016	0.082
5/26/2016	0.080
7/22/2016	0.076
6/26/2016	0.075
5/28/2016	0.074
5/27/2016	0.071
7/25/2016	0.070
7/21/2016	0.070
8/24/2016	0.069
9/8/2016	0.069
7/6/2016	0.069

Value	Ozone MDA8 (ppb)
2016 4th (fire)	75
2016 4th (no fire)	70
2014-16 DV (fire)	74
2014-16 DV (no fire)	72



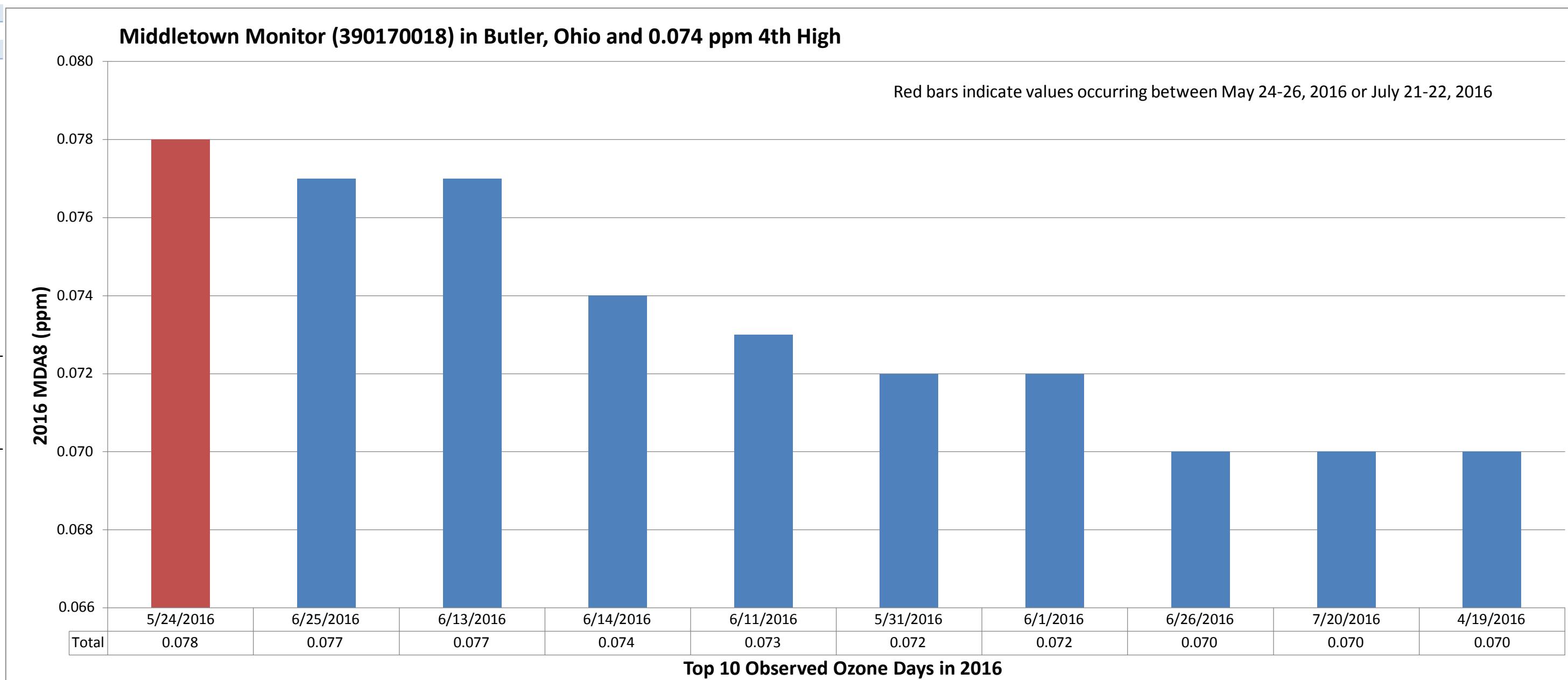
AQS_SITE_ID	390030009
Row Labels	Sum of Daily MDA8
5/24/2016	0.077
4/18/2016	0.074
4/17/2016	0.071
6/3/2016	0.068
9/22/2016	0.067
4/16/2016	0.066
6/11/2016	0.066
5/25/2016	0.065
7/28/2016	0.065
7/20/2016	0.065
6/19/2016	0.065

Value	Ozone MDA8 (ppb)
2016 4th (fire)	68
2016 4th (no fire)	67
2014-16 DV (fire)	66
2014-16 DV (no fire)	65



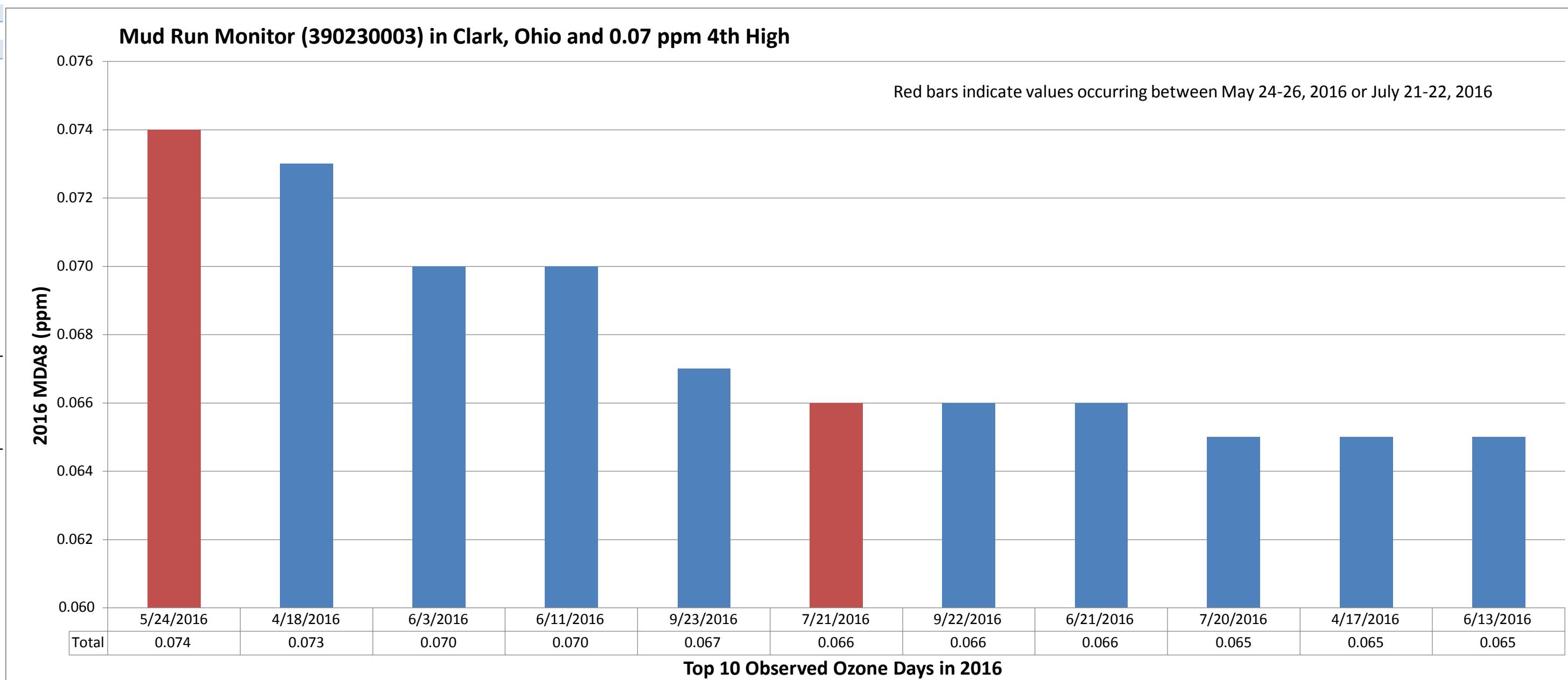
AQS_SITE_ID	390170018
Row Labels	Sum of Daily MDA8
5/24/2016	0.078
6/25/2016	0.077
6/13/2016	0.077
6/14/2016	0.074
6/11/2016	0.073
5/31/2016	0.072
6/1/2016	0.072
6/26/2016	0.070
7/20/2016	0.070
4/19/2016	0.070

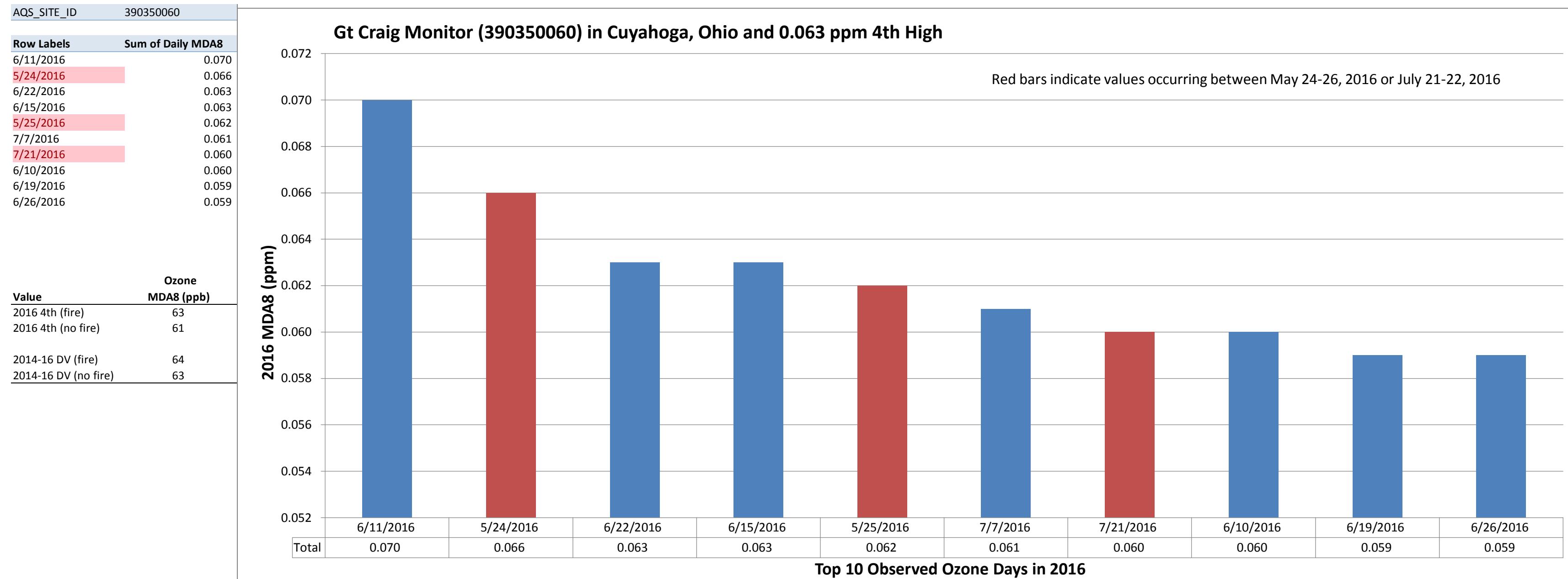
Value	Ozone MDA8 (ppb)
2016 4th (fire)	74
2016 4th (no fire)	73
2014-16 DV (fire)	71
2014-16 DV (no fire)	70

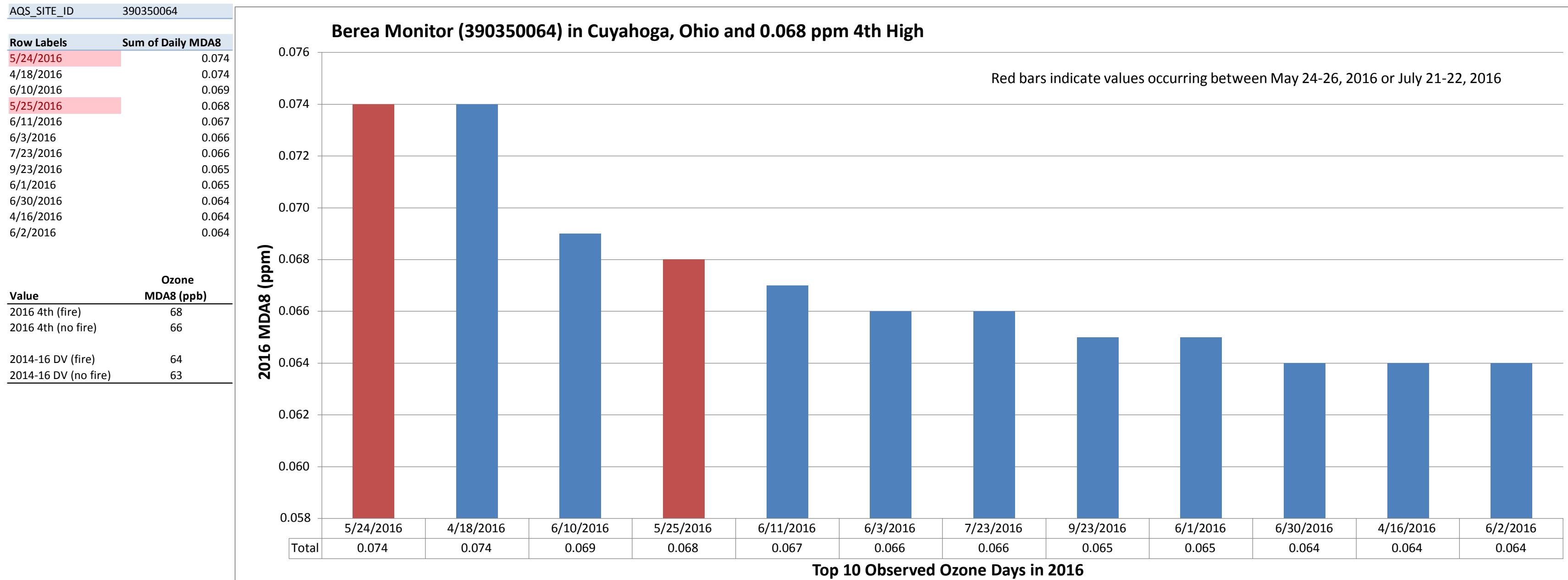


AQS_SITE_ID	390230003
Row Labels	Sum of Daily MDA8
5/24/2016	0.074
4/18/2016	0.073
6/3/2016	0.070
6/11/2016	0.070
9/23/2016	0.067
7/21/2016	0.066
9/22/2016	0.066
6/21/2016	0.066
7/20/2016	0.065
4/17/2016	0.065
6/13/2016	0.065

Value	Ozone MDA8 (ppb)
2016 4th (fire)	70
2016 4th (no fire)	67
2014-16 DV (fire)	67
2014-16 DV (no fire)	66

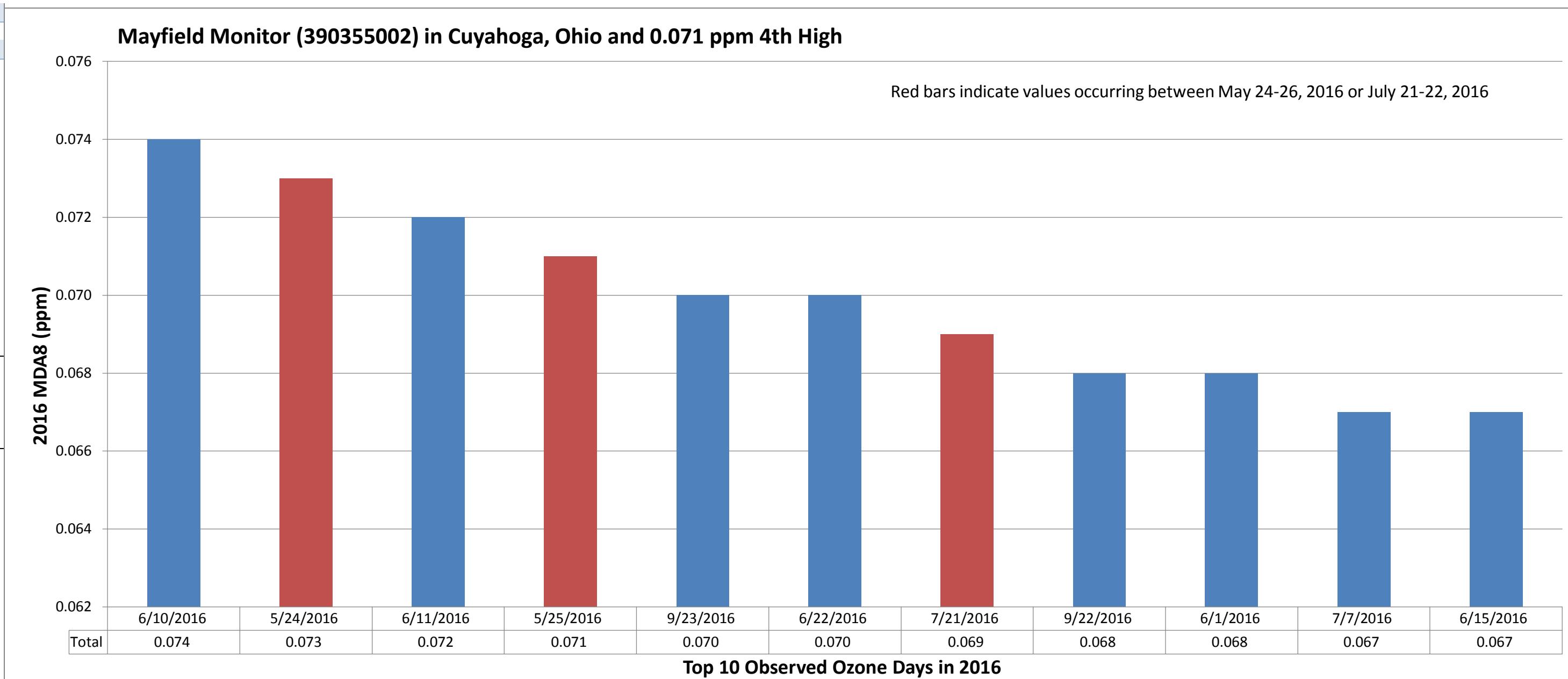


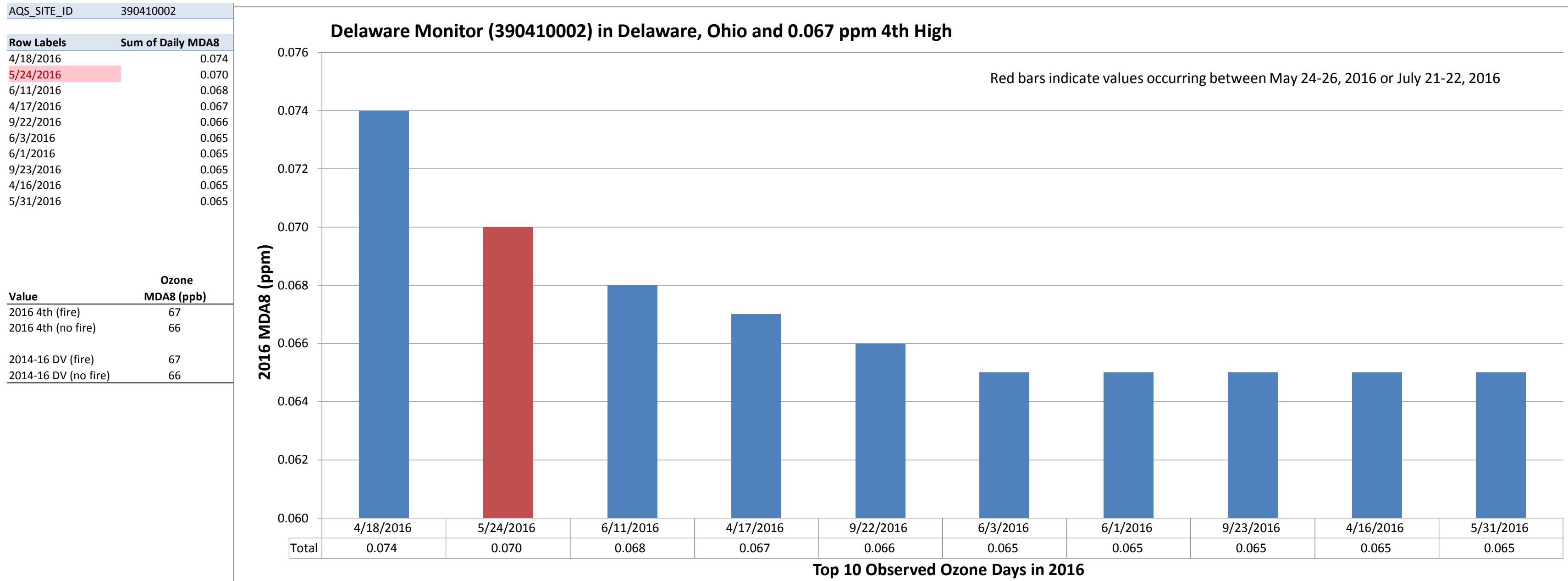




AQS_SITE_ID	390355002
Row Labels	Sum of Daily MDA8
6/10/2016	0.074
5/24/2016	0.073
6/11/2016	0.072
5/25/2016	0.071
9/23/2016	0.070
6/22/2016	0.070
7/21/2016	0.069
9/22/2016	0.068
6/1/2016	0.068
7/7/2016	0.067
6/15/2016	0.067

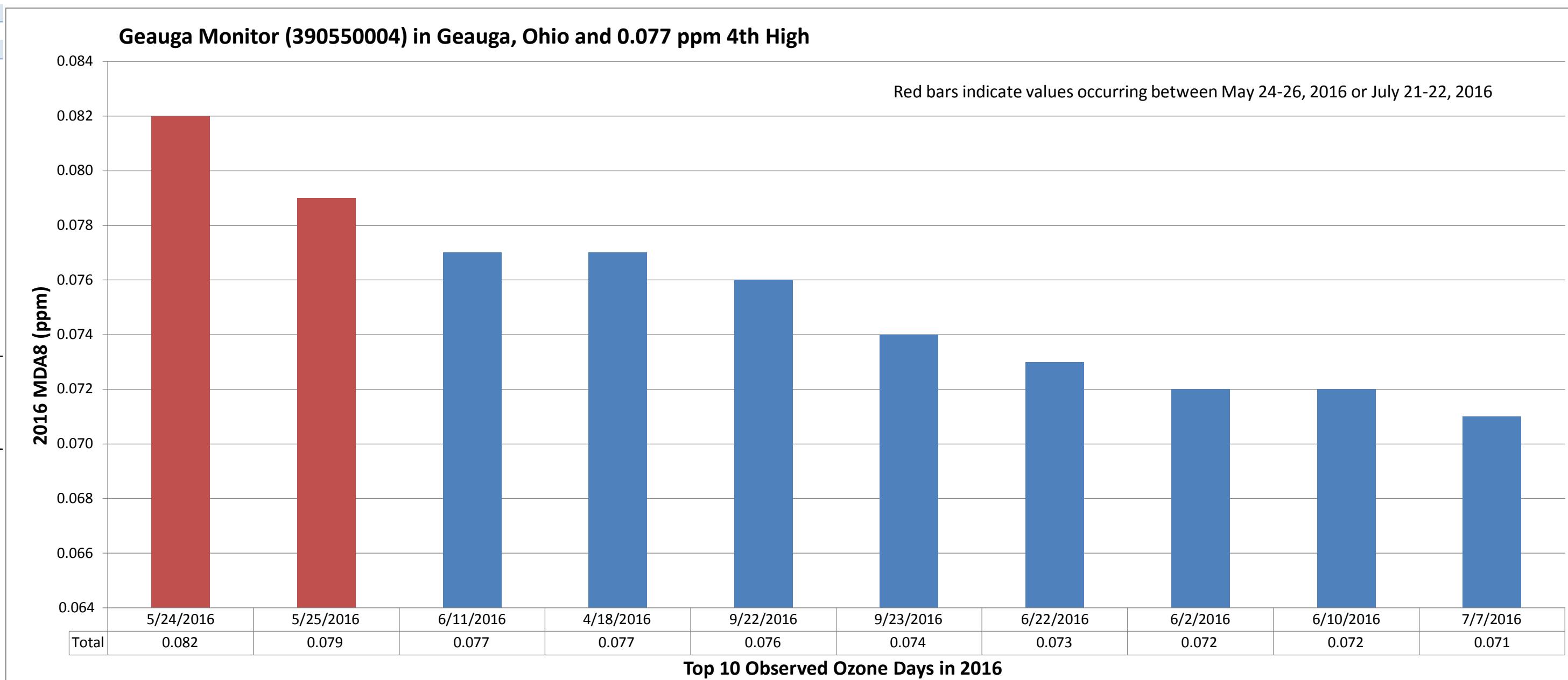
Value	Ozone MDA8 (ppb)
2016 4th (fire)	71
2016 4th (no fire)	70
2014-16 DV (fire)	68
2014-16 DV (no fire)	67

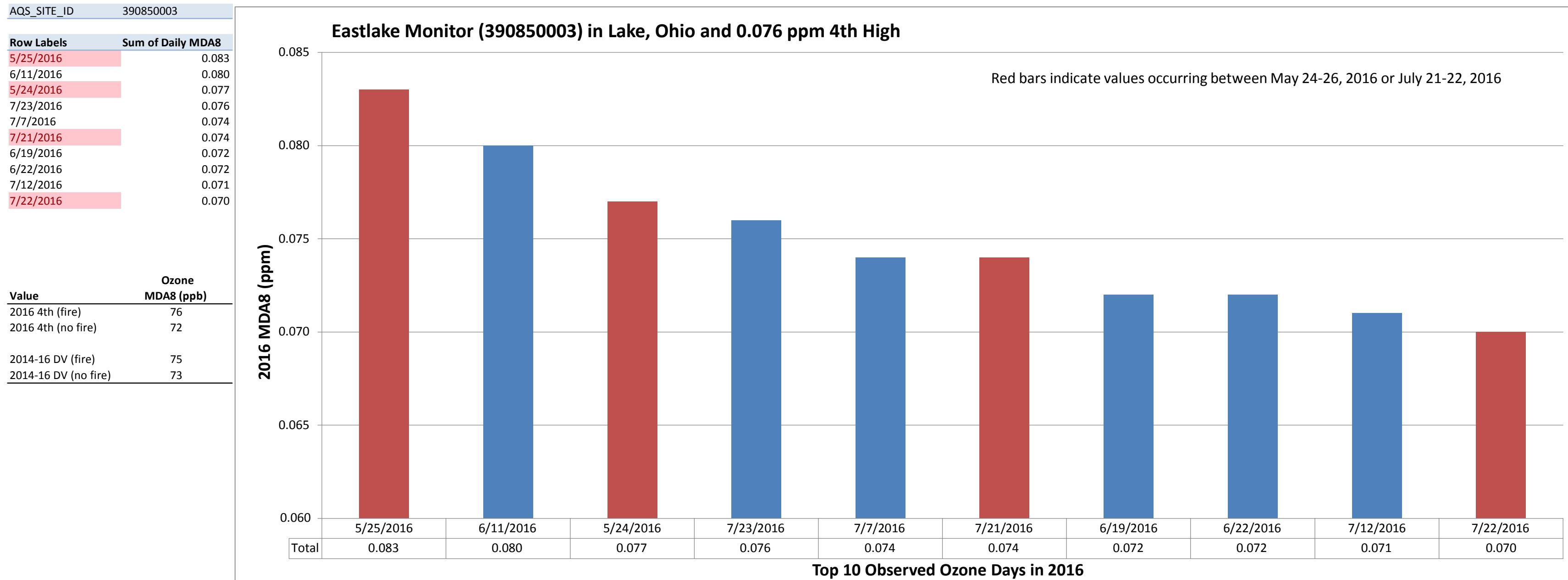


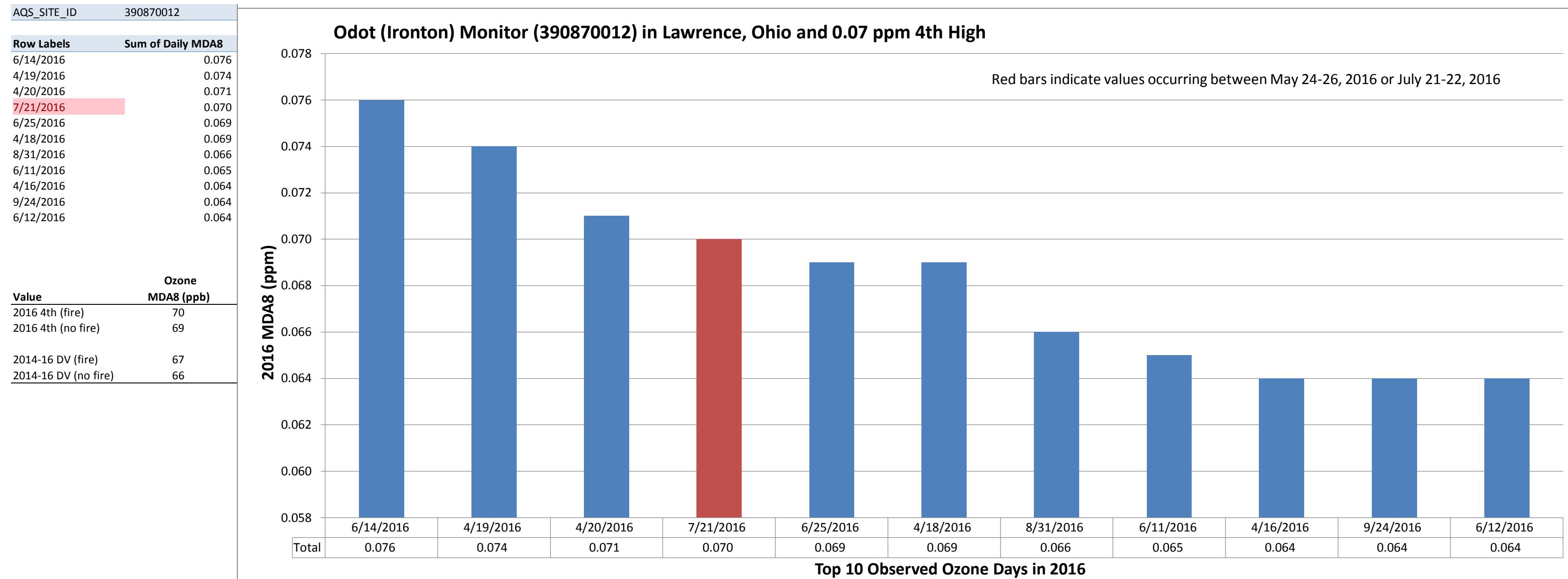


AQS_SITE_ID	390550004
Row Labels	Sum of Daily MDA8
5/24/2016	0.082
5/25/2016	0.079
6/11/2016	0.077
4/18/2016	0.077
9/22/2016	0.076
9/23/2016	0.074
6/22/2016	0.073
6/2/2016	0.072
6/10/2016	0.072
7/7/2016	0.071

Value	Ozone MDA8 (ppb)
2016 4th (fire)	77
2016 4th (no fire)	74
2014-16 DV (fire)	71
2014-16 DV (no fire)	70

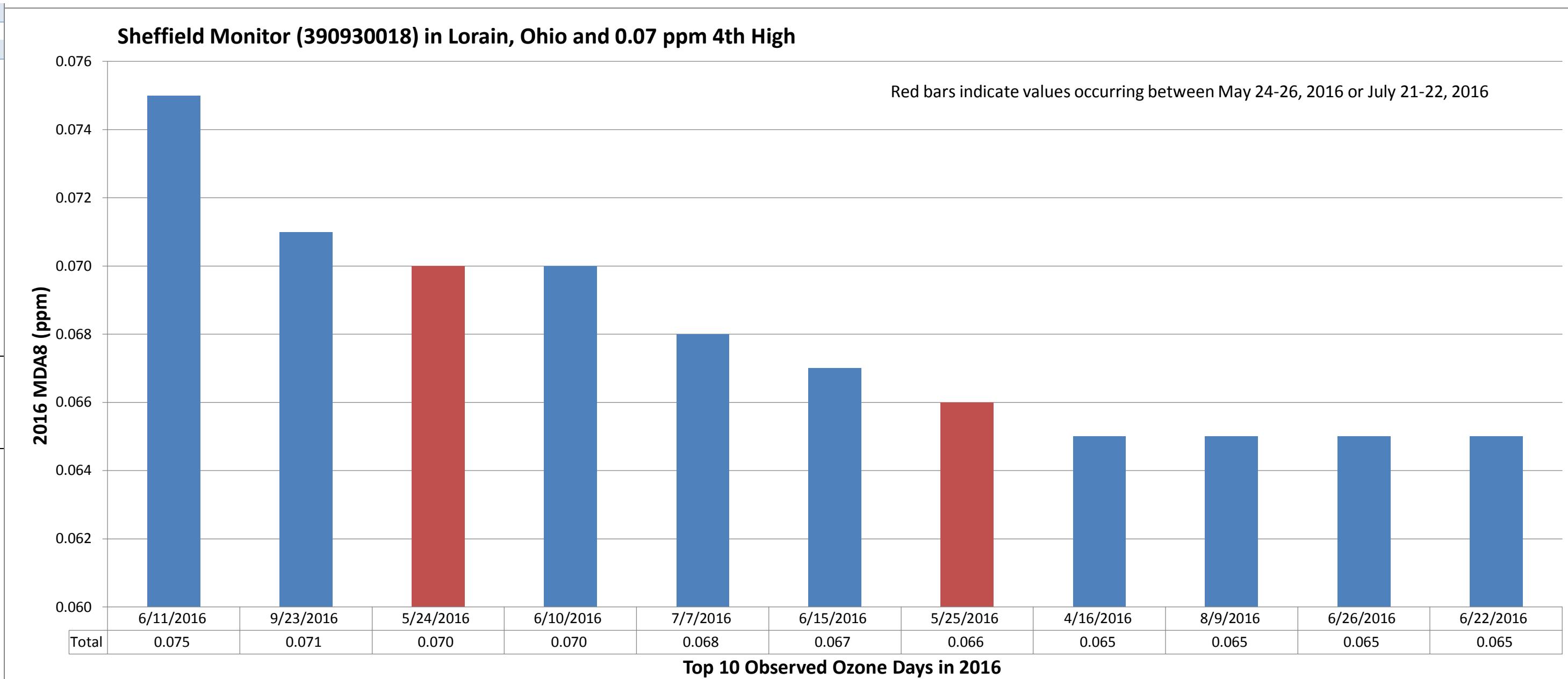






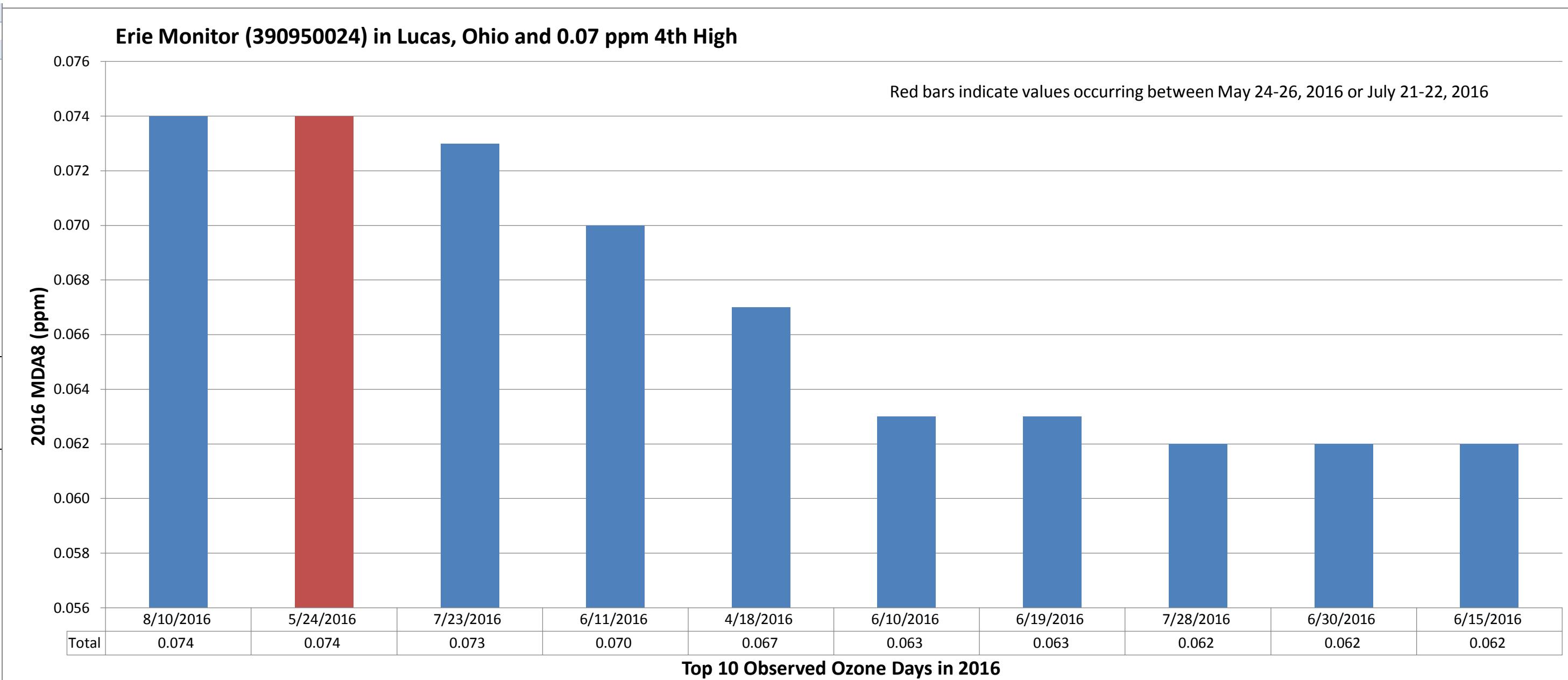
AQS_SITE_ID	390930018
Row Labels	Sum of Daily MDA8
6/11/2016	0.075
9/23/2016	0.071
5/24/2016	0.070
6/10/2016	0.070
7/7/2016	0.068
6/15/2016	0.067
5/25/2016	0.066
4/16/2016	0.065
8/9/2016	0.065
6/26/2016	0.065
6/22/2016	0.065

Value	Ozone MDA8 (ppb)
2016 4th (fire)	70
2016 4th (no fire)	68
2014-16 DV (fire)	66
2014-16 DV (no fire)	65



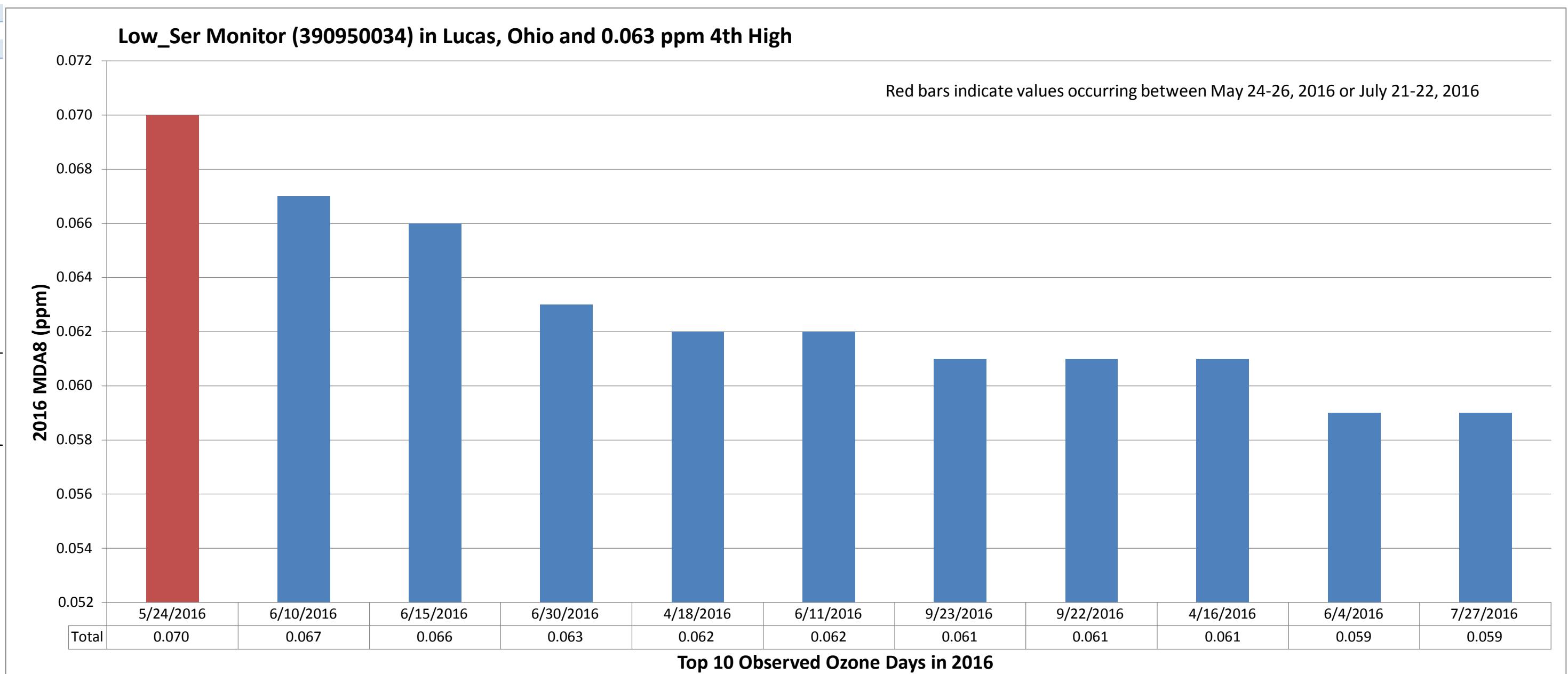
AQS_SITE_ID	390950024
Row Labels	Sum of Daily MDA8
8/10/2016	0.074
5/24/2016	0.074
7/23/2016	0.073
6/11/2016	0.070
4/18/2016	0.067
6/10/2016	0.063
6/19/2016	0.063
7/28/2016	0.062
6/30/2016	0.062
6/15/2016	0.062

Value	Ozone MDA8 (ppb)
2016 4th (fire)	70
2016 4th (no fire)	67
2014-16 DV (fire)	67
2014-16 DV (no fire)	66



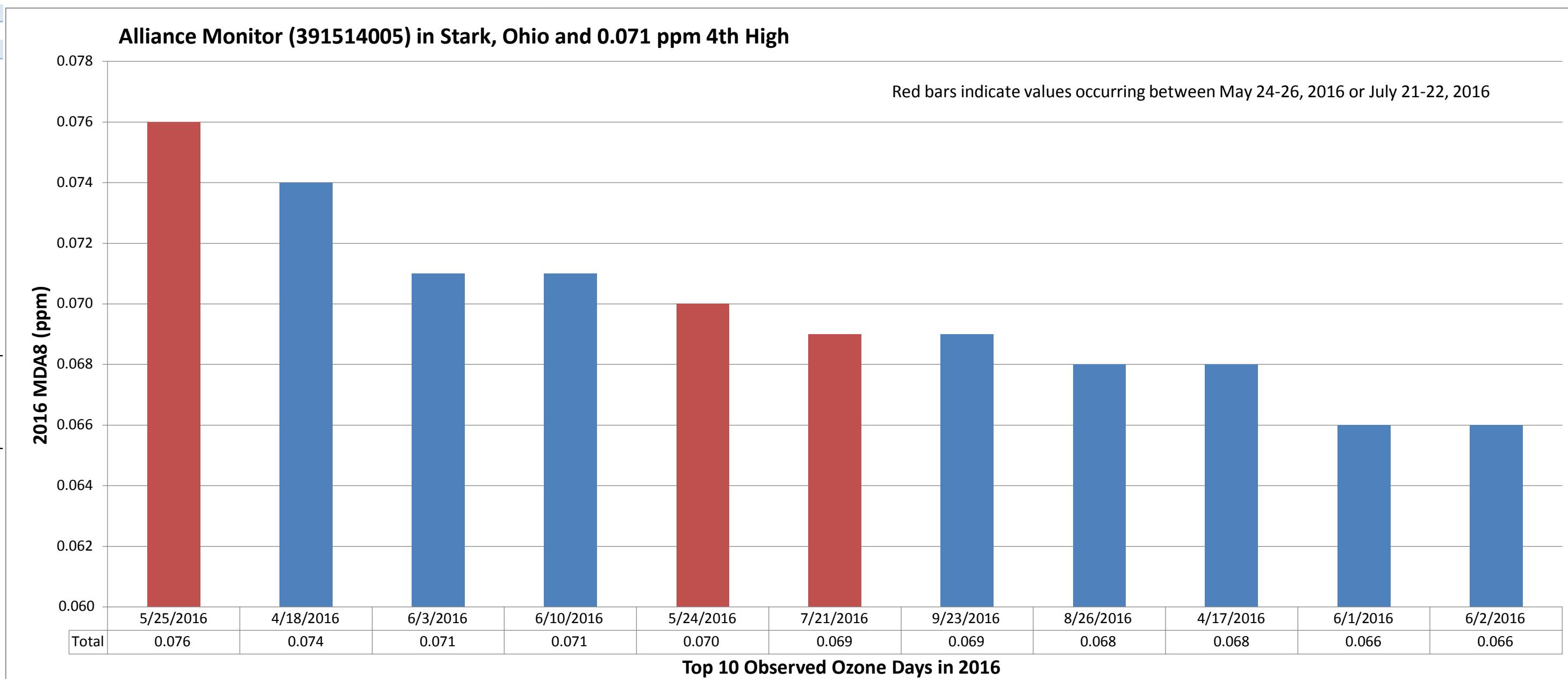
AQS_SITE_ID	390950034
Row Labels	Sum of Daily MDA8
5/24/2016	0.070
6/10/2016	0.067
6/15/2016	0.066
6/30/2016	0.063
4/18/2016	0.062
6/11/2016	0.062
9/23/2016	0.061
9/22/2016	0.061
4/16/2016	0.061
6/4/2016	0.059
7/27/2016	0.059

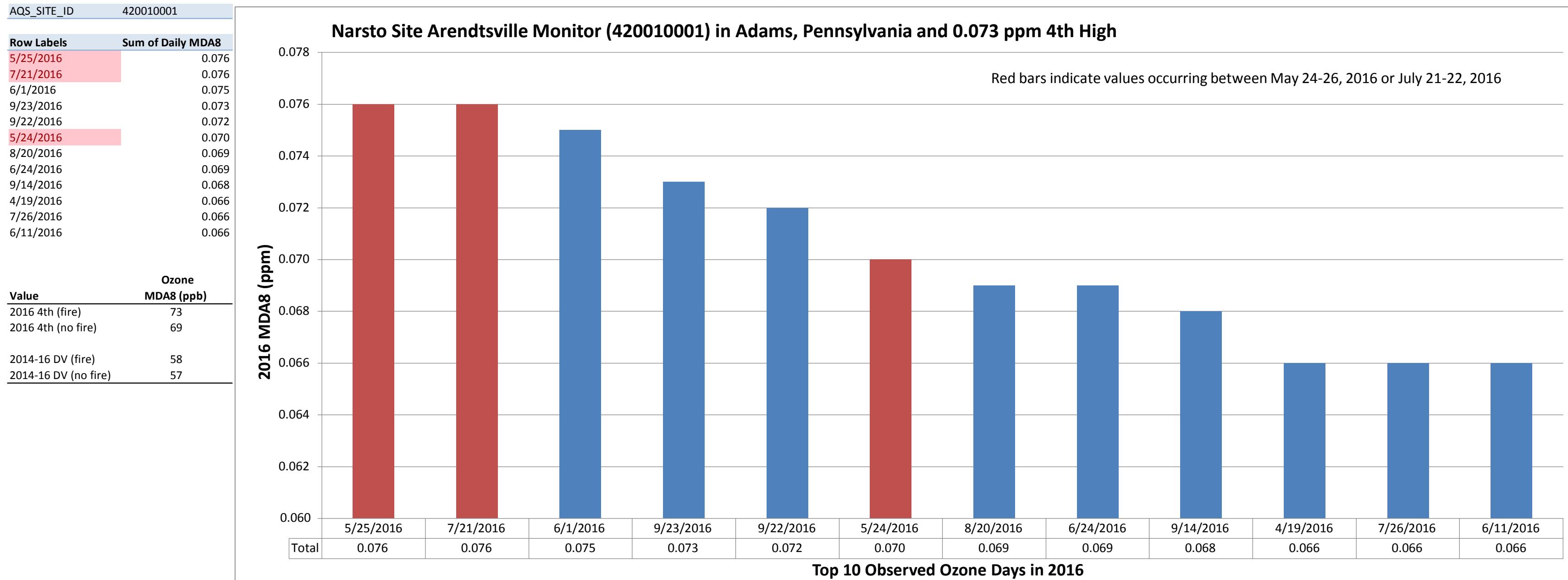
Value	Ozone MDA8 (ppb)
2016 4th (fire)	63
2016 4th (no fire)	62
2014-16 DV (fire)	64
2014-16 DV (no fire)	63

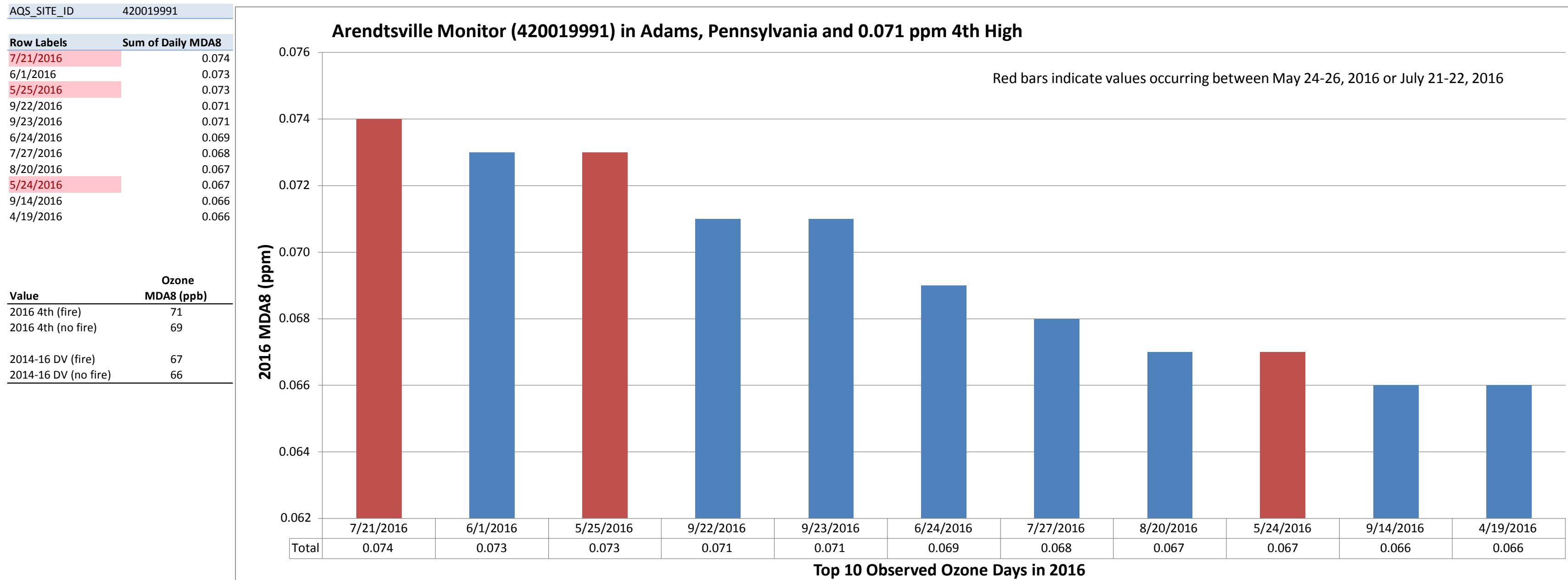


AQS_SITE_ID	391514005
Row Labels	Sum of Daily MDA8
5/25/2016	0.076
4/18/2016	0.074
6/3/2016	0.071
6/10/2016	0.071
5/24/2016	0.070
7/21/2016	0.069
9/23/2016	0.069
8/26/2016	0.068
4/17/2016	0.068
6/1/2016	0.066
6/2/2016	0.066

Value	Ozone MDA8 (ppb)
2016 4th (fire)	71
2016 4th (no fire)	69
2014-16 DV (fire)	66
2014-16 DV (no fire)	65

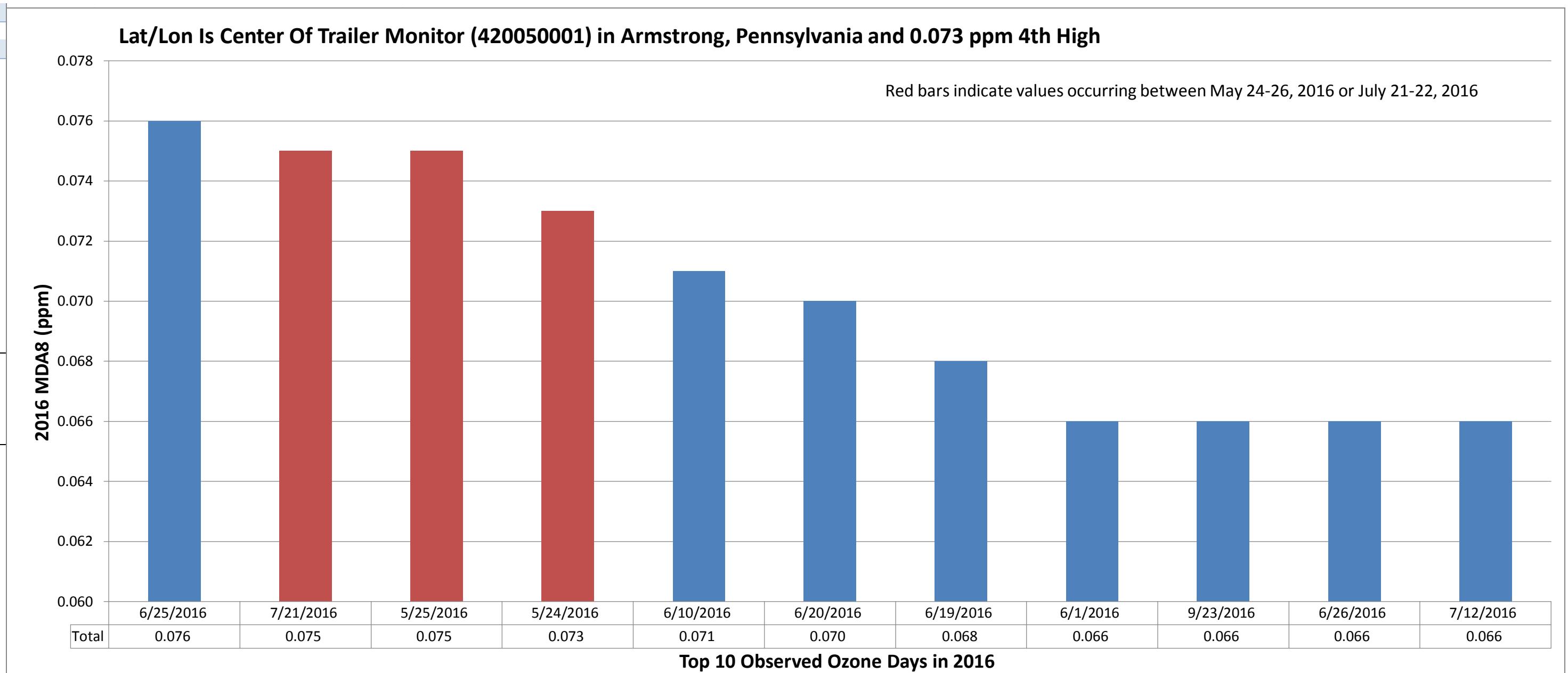






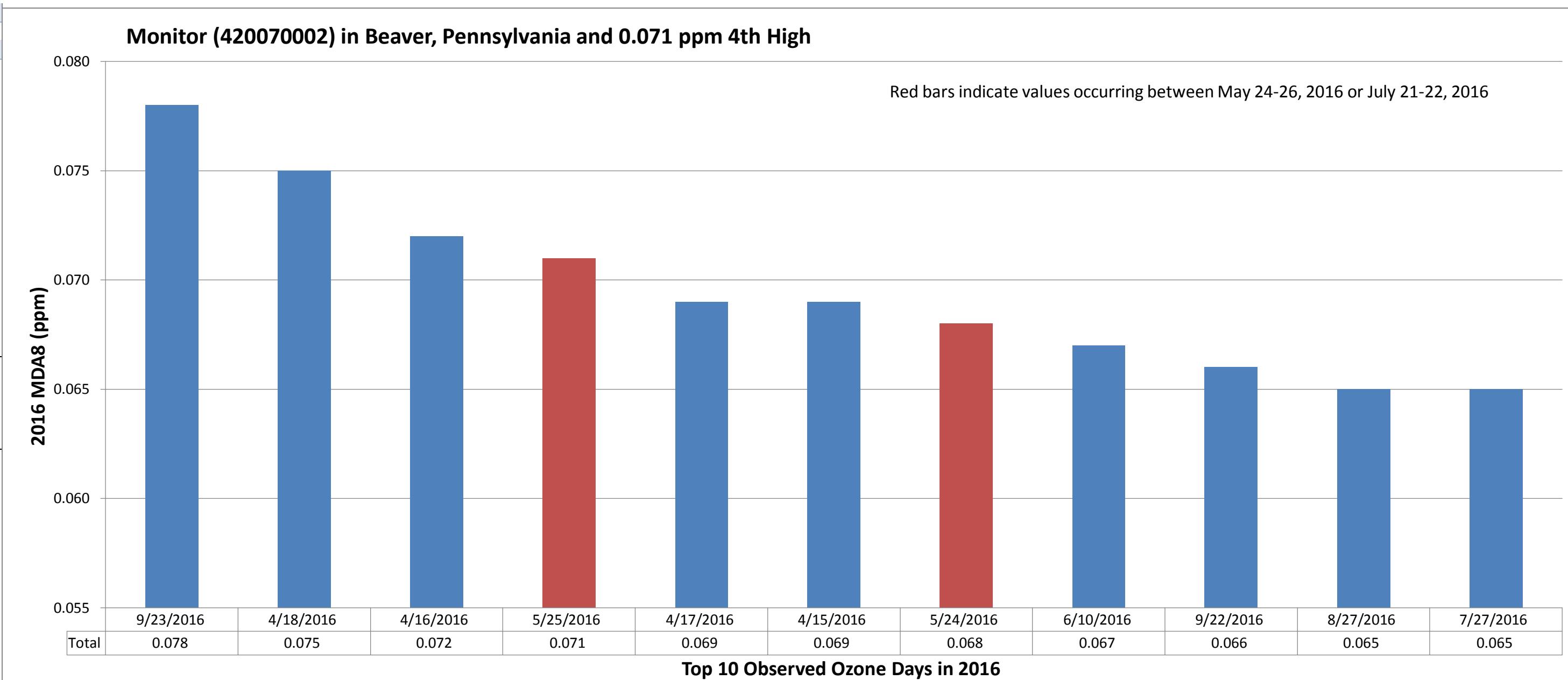
AQS_SITE_ID	420050001
Row Labels	Sum of Daily MDA8
6/25/2016	0.076
7/21/2016	0.075
5/25/2016	0.075
5/24/2016	0.073
6/10/2016	0.071
6/20/2016	0.070
6/19/2016	0.068
6/1/2016	0.066
9/23/2016	0.066
6/26/2016	0.066
7/12/2016	0.066

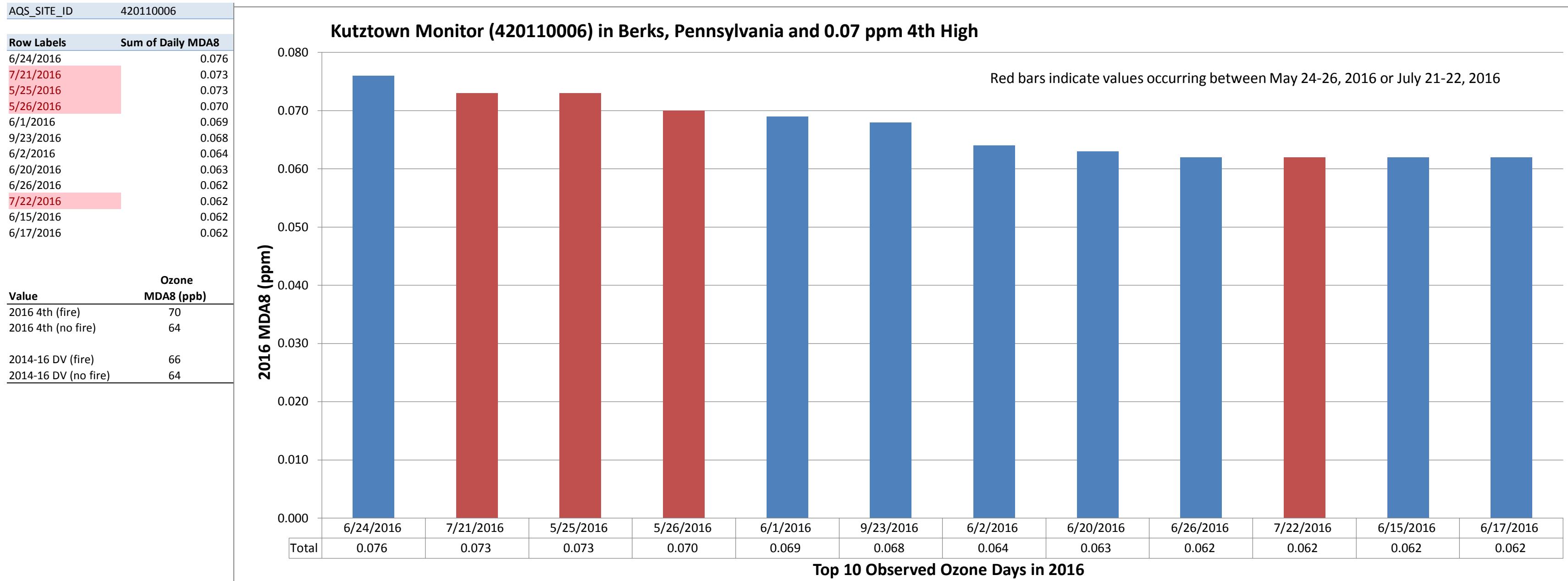
Value	Ozone MDA8 (ppb)
2016 4th (fire)	73
2016 4th (no fire)	68
2014-16 DV (fire)	70
2014-16 DV (no fire)	68

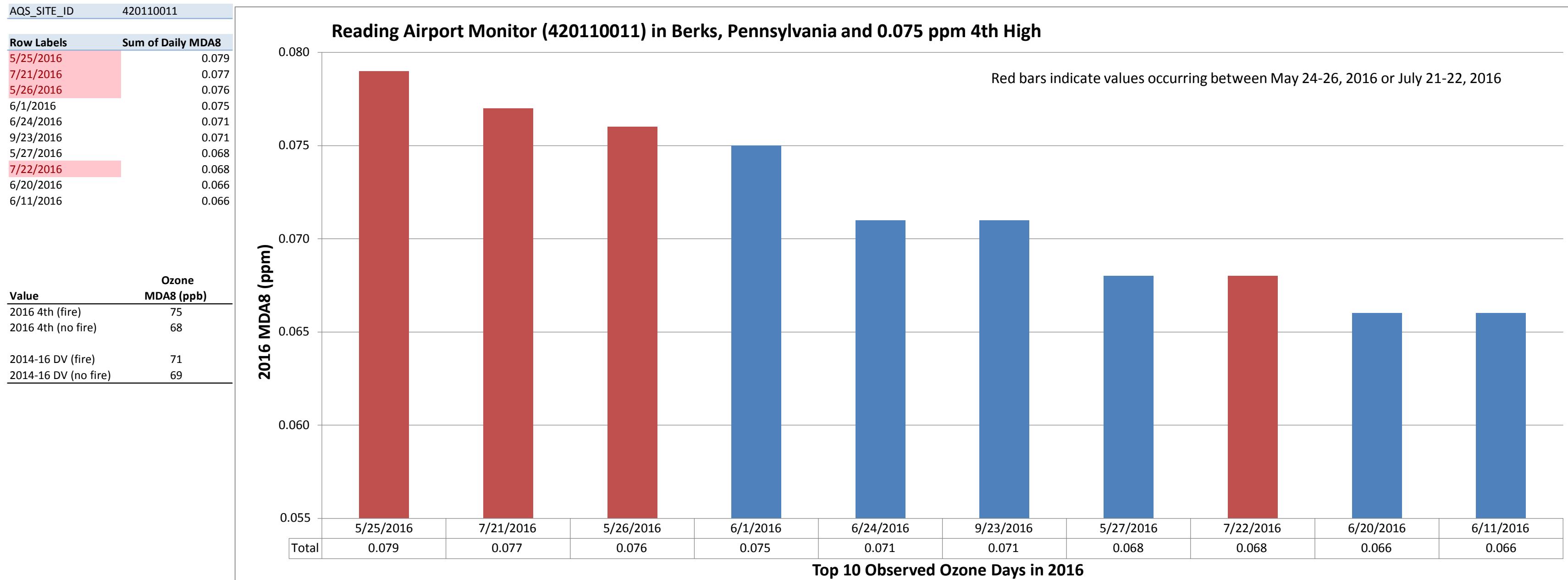


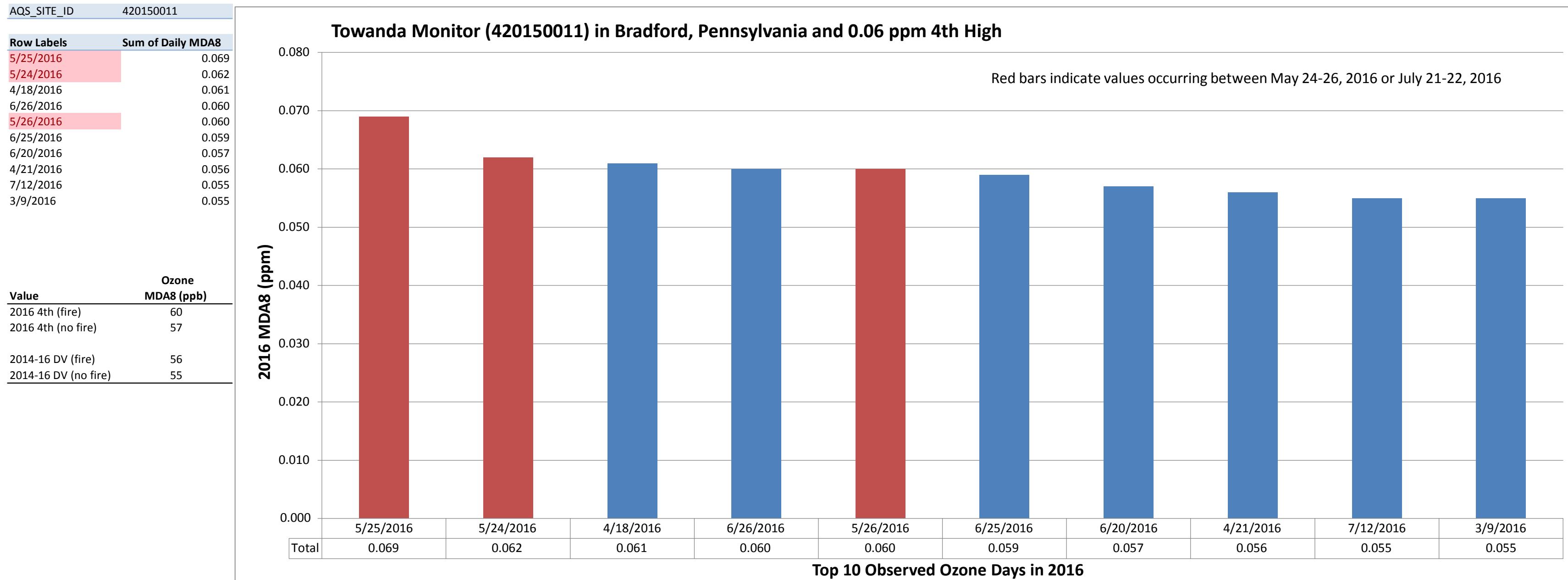
AQS_SITE_ID	420070002
Row Labels	Sum of Daily MDA8
9/23/2016	0.078
4/18/2016	0.075
4/16/2016	0.072
5/25/2016	0.071
4/17/2016	0.069
4/15/2016	0.069
5/24/2016	0.068
6/10/2016	0.067
9/22/2016	0.066
8/27/2016	0.065
7/27/2016	0.065

Value	Ozone MDA8 (ppb)
2016 4th (fire)	71
2016 4th (no fire)	69
2014-16 DV (fire)	70
2014-16 DV (no fire)	69



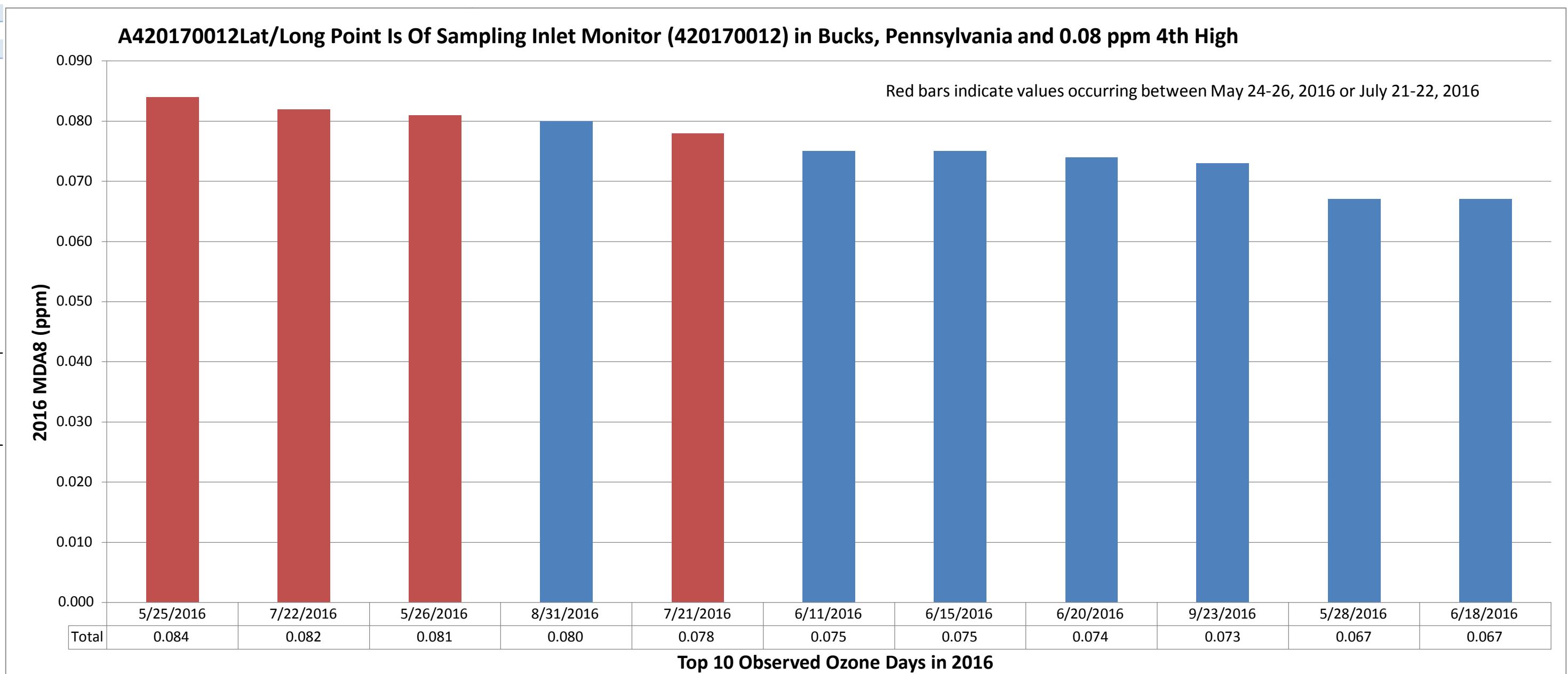






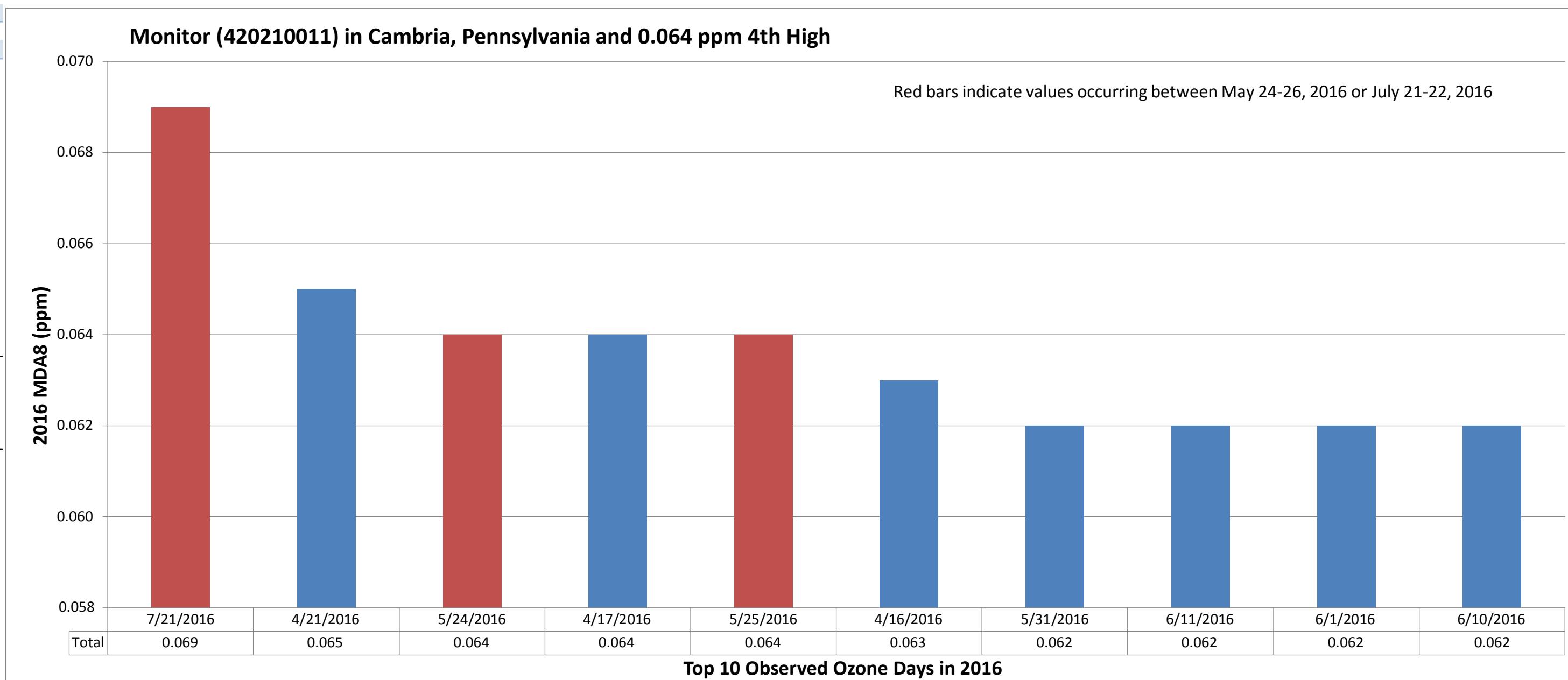
AQS_SITE_ID	420170012
Row Labels	Sum of Daily MDA8
5/25/2016	0.084
7/22/2016	0.082
5/26/2016	0.081
8/31/2016	0.080
7/21/2016	0.078
6/11/2016	0.075
6/15/2016	0.075
6/20/2016	0.074
9/23/2016	0.073
5/28/2016	0.067
6/18/2016	0.067

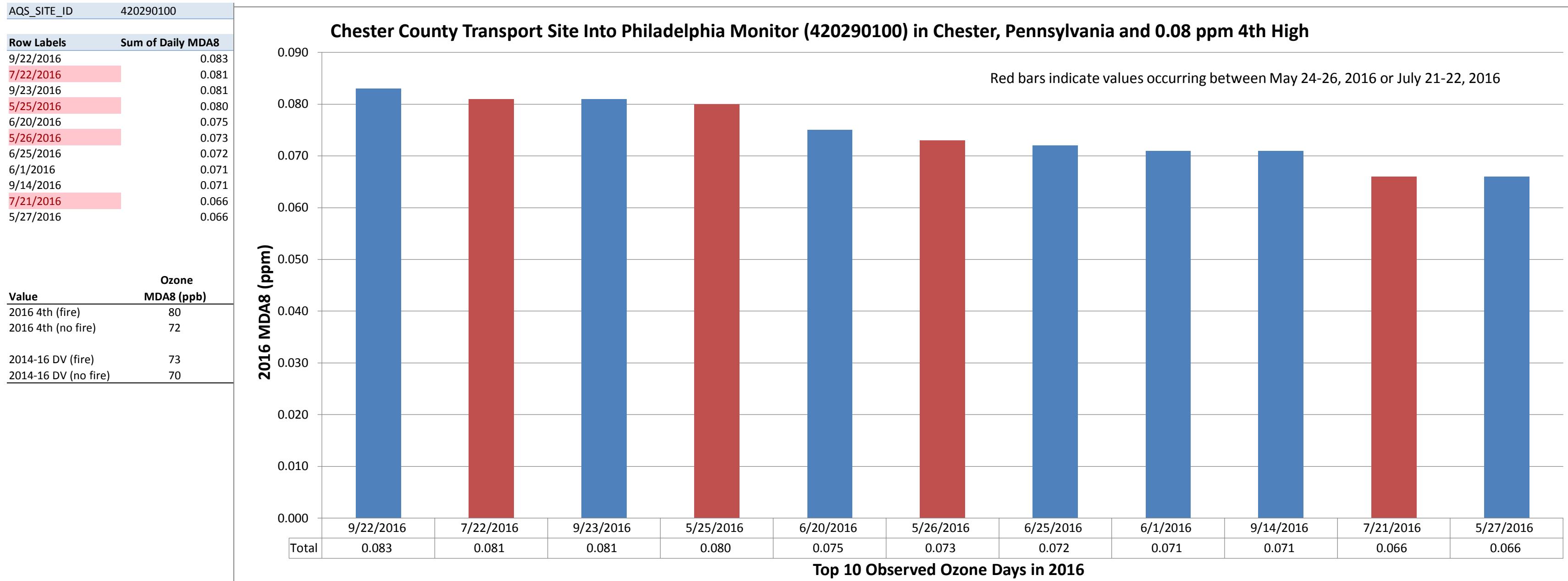
Value	Ozone MDA8 (ppb)
2016 4th (fire)	80
2016 4th (no fire)	74
2014-16 DV (fire)	77
2014-16 DV (no fire)	75



AQS_SITE_ID	420210011
Row Labels	Sum of Daily MDA8
7/21/2016	0.069
4/21/2016	0.065
5/24/2016	0.064
4/17/2016	0.064
5/25/2016	0.064
4/16/2016	0.063
5/31/2016	0.062
6/11/2016	0.062
6/1/2016	0.062
6/10/2016	0.062

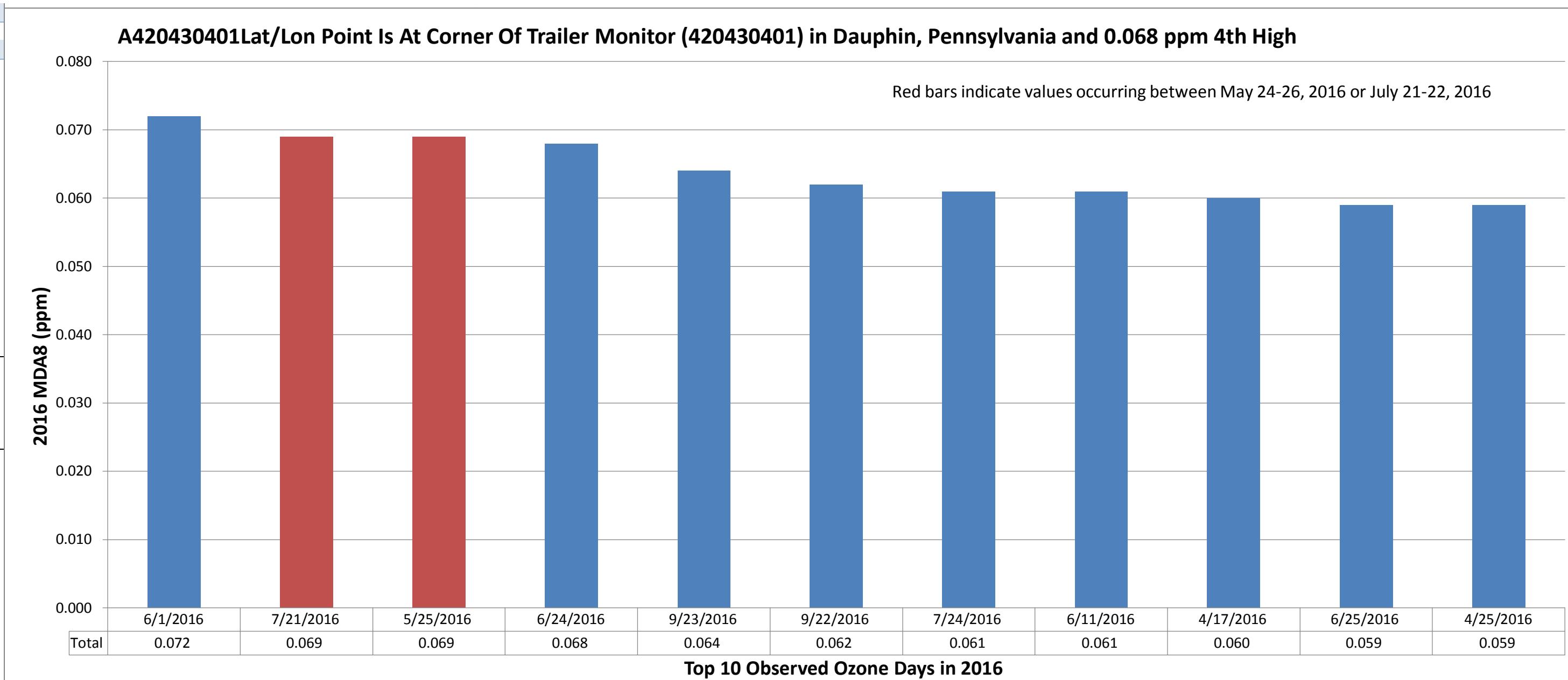
Value	Ozone MDA8 (ppb)
2016 4th (fire)	64
2016 4th (no fire)	62
2014-16 DV (fire)	63
2014-16 DV (no fire)	62





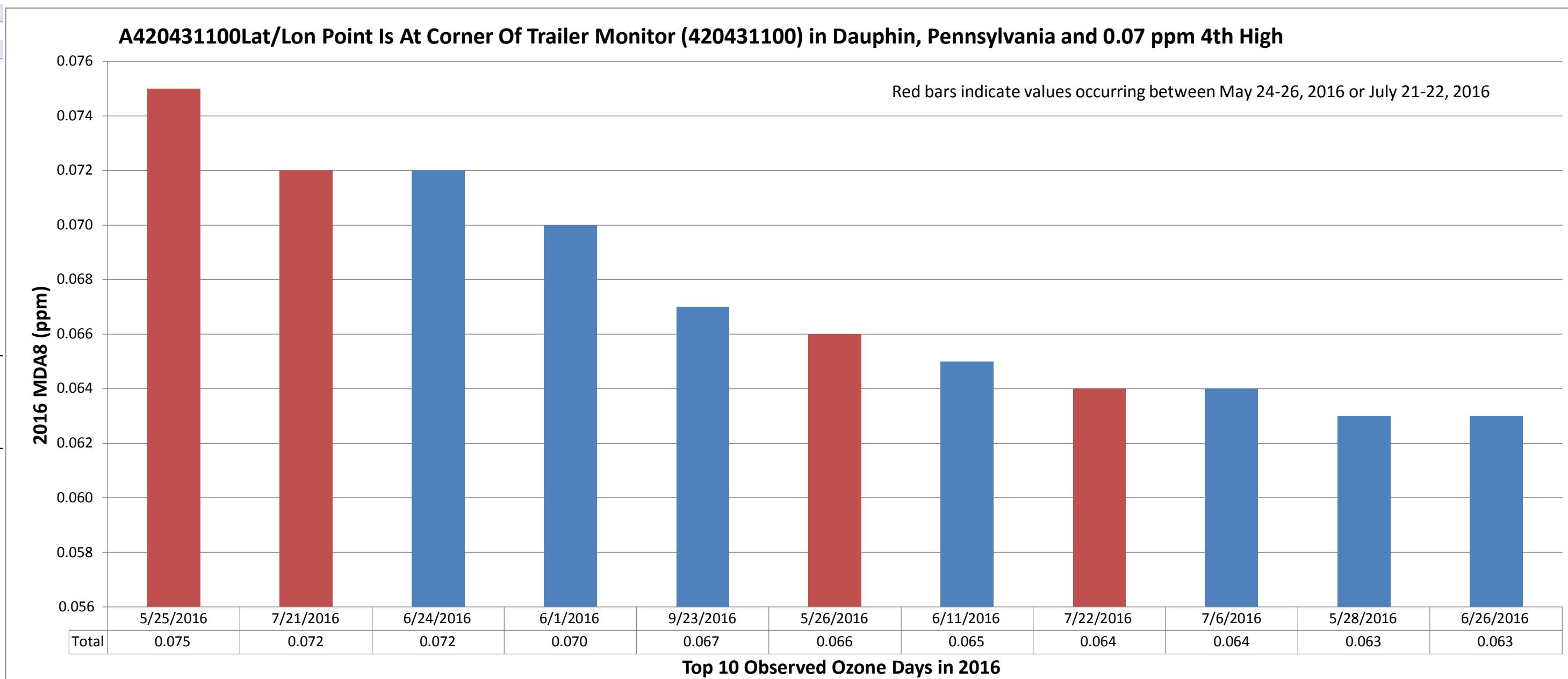
AQS_SITE_ID	420430401
Row Labels	Sum of Daily MDA8
6/1/2016	0.072
7/21/2016	0.069
5/25/2016	0.069
6/24/2016	0.068
9/23/2016	0.064
9/22/2016	0.062
7/24/2016	0.061
6/11/2016	0.061
4/17/2016	0.060
6/25/2016	0.059
4/25/2016	0.059

Value	Ozone MDA8 (ppb)
2016 4th (fire)	68
2016 4th (no fire)	62
2014-16 DV (fire)	66
2014-16 DV (no fire)	64



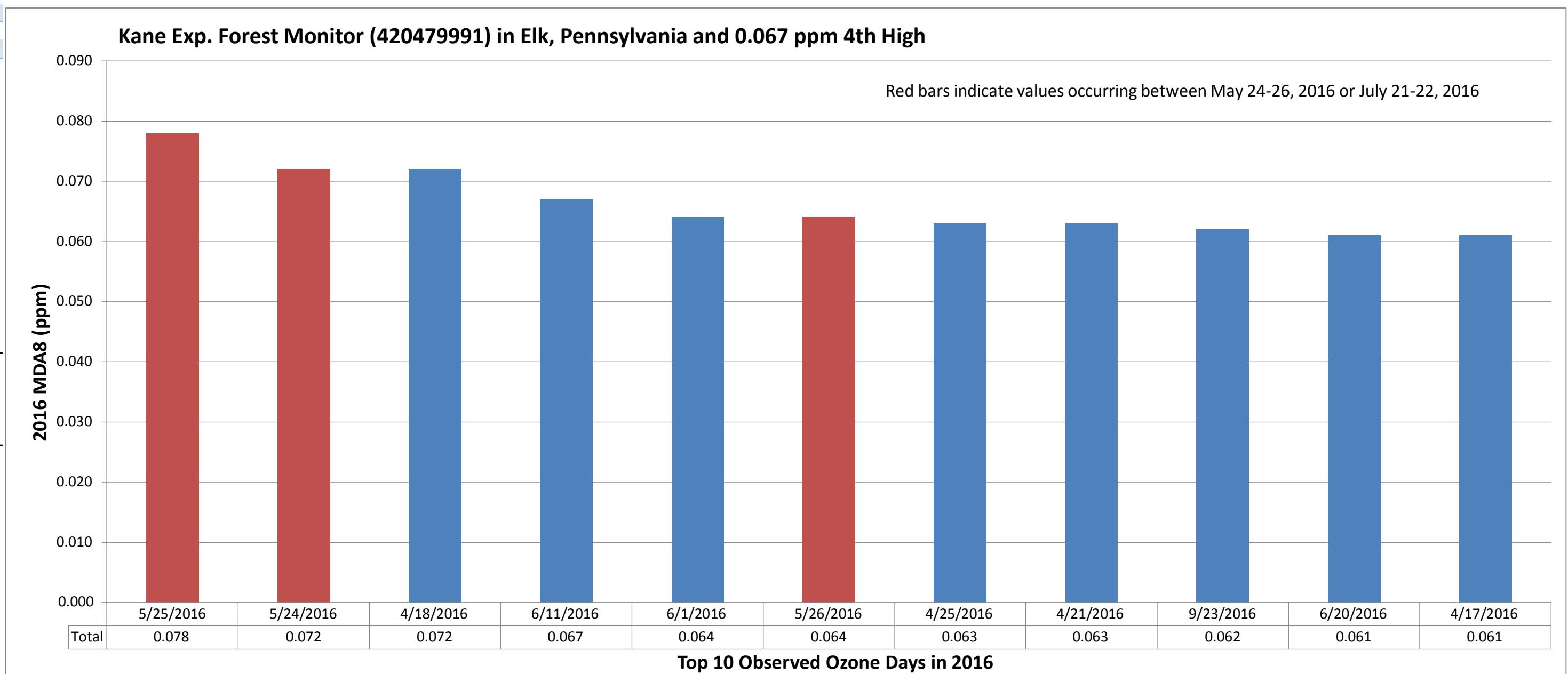
AQS_SITE_ID	420431100
Row Labels	Sum of Daily MDA8
5/25/2016	0.075
7/21/2016	0.072
6/24/2016	0.072
6/1/2016	0.070
9/23/2016	0.067
5/26/2016	0.066
6/11/2016	0.065
7/22/2016	0.064
7/6/2016	0.064
5/28/2016	0.063
6/26/2016	0.063

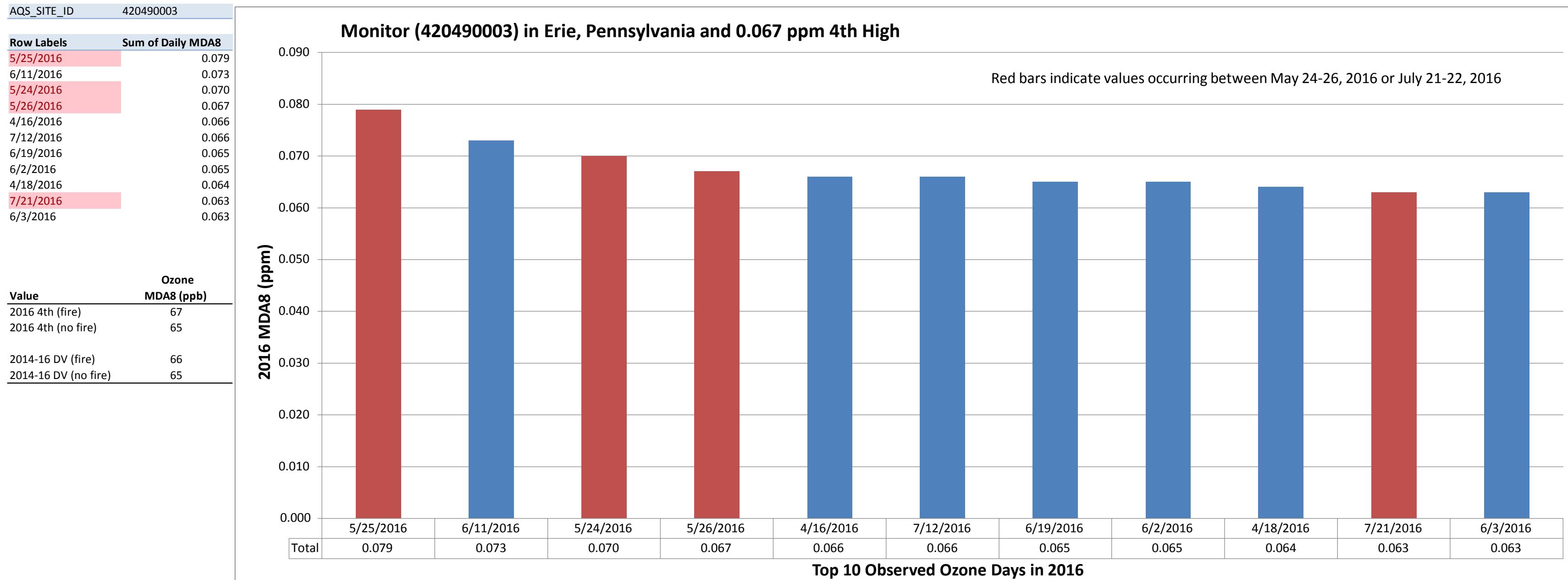
Value	Ozone MDA8 (ppb)
2016 4th (fire)	70
2016 4th (no fire)	65
2014-16 DV (fire)	67
2014-16 DV (no fire)	65



AQS_SITE_ID	420479991
Row Labels	Sum of Daily MDA8
5/25/2016	0.078
5/24/2016	0.072
4/18/2016	0.072
6/11/2016	0.067
6/1/2016	0.064
5/26/2016	0.064
4/25/2016	0.063
4/21/2016	0.063
9/23/2016	0.062
6/20/2016	0.061
4/17/2016	0.061

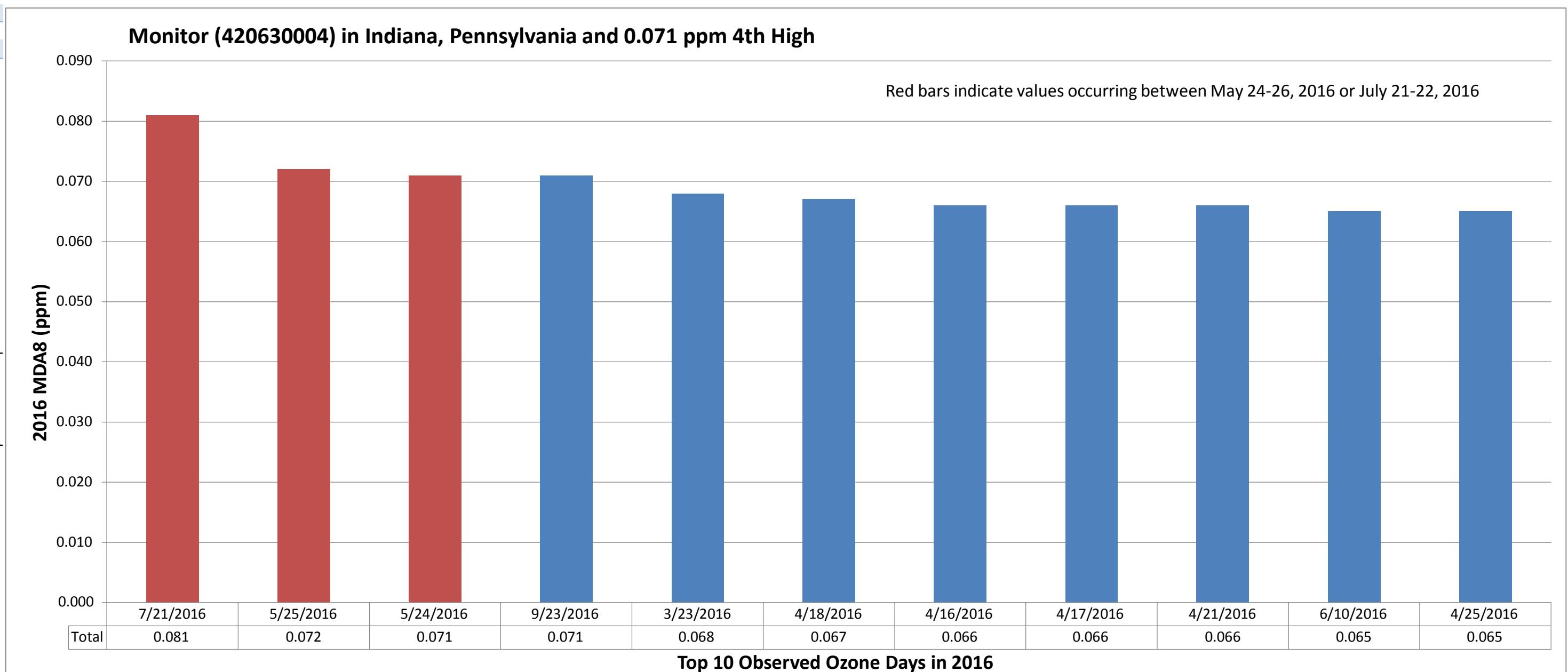
Value	Ozone MDA8 (ppb)
2016 4th (fire)	67
2016 4th (no fire)	63
2014-16 DV (fire)	66
2014-16 DV (no fire)	64

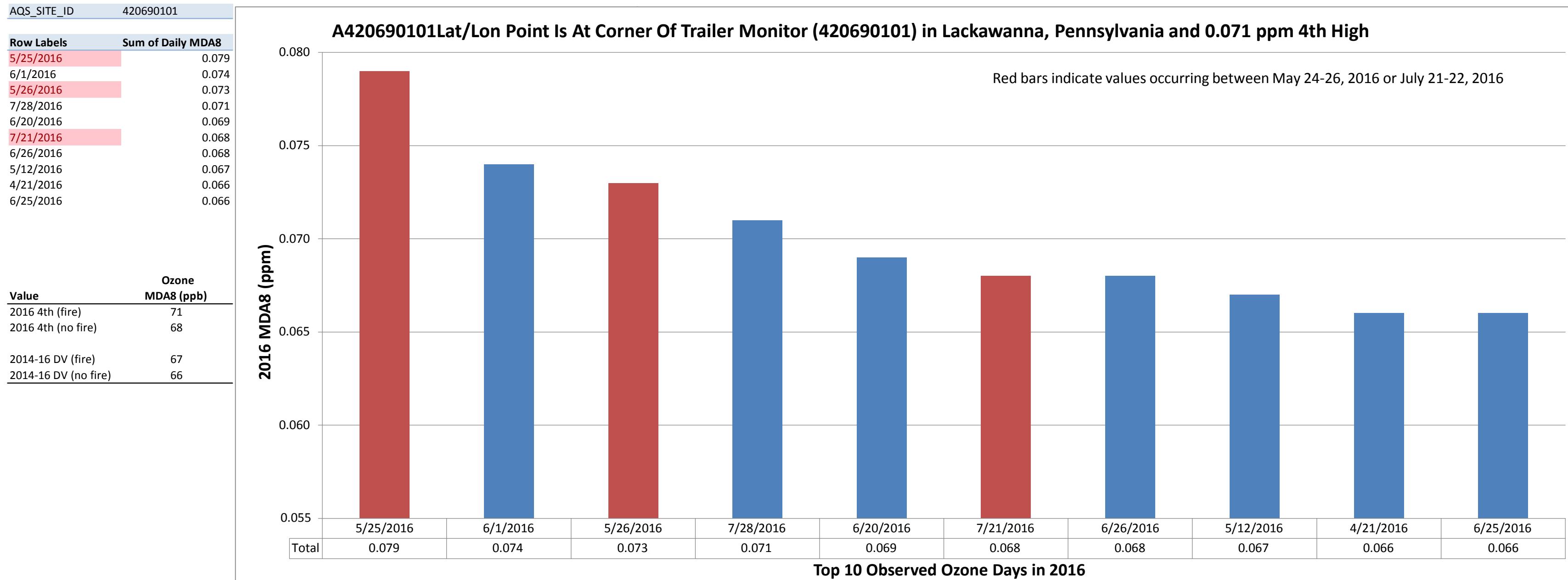




AQS_SITE_ID	420630004
Row Labels	Sum of Daily MDA8
7/21/2016	0.081
5/25/2016	0.072
5/24/2016	0.071
9/23/2016	0.071
3/23/2016	0.068
4/18/2016	0.067
4/16/2016	0.066
4/17/2016	0.066
4/21/2016	0.066
6/10/2016	0.065
4/25/2016	0.065

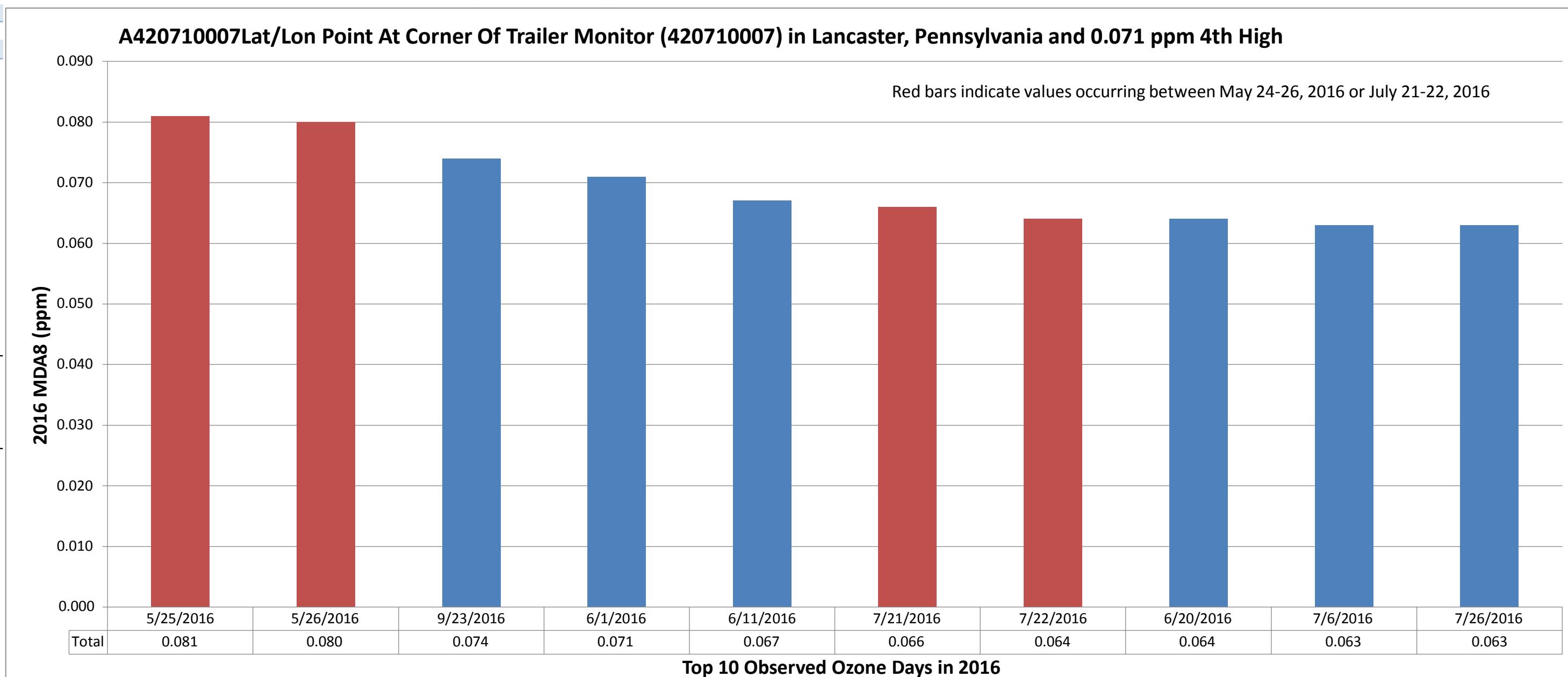
Value	Ozone MDA8 (ppb)
2016 4th (fire)	71
2016 4th (no fire)	66
2014-16 DV (fire)	70
2014-16 DV (no fire)	69

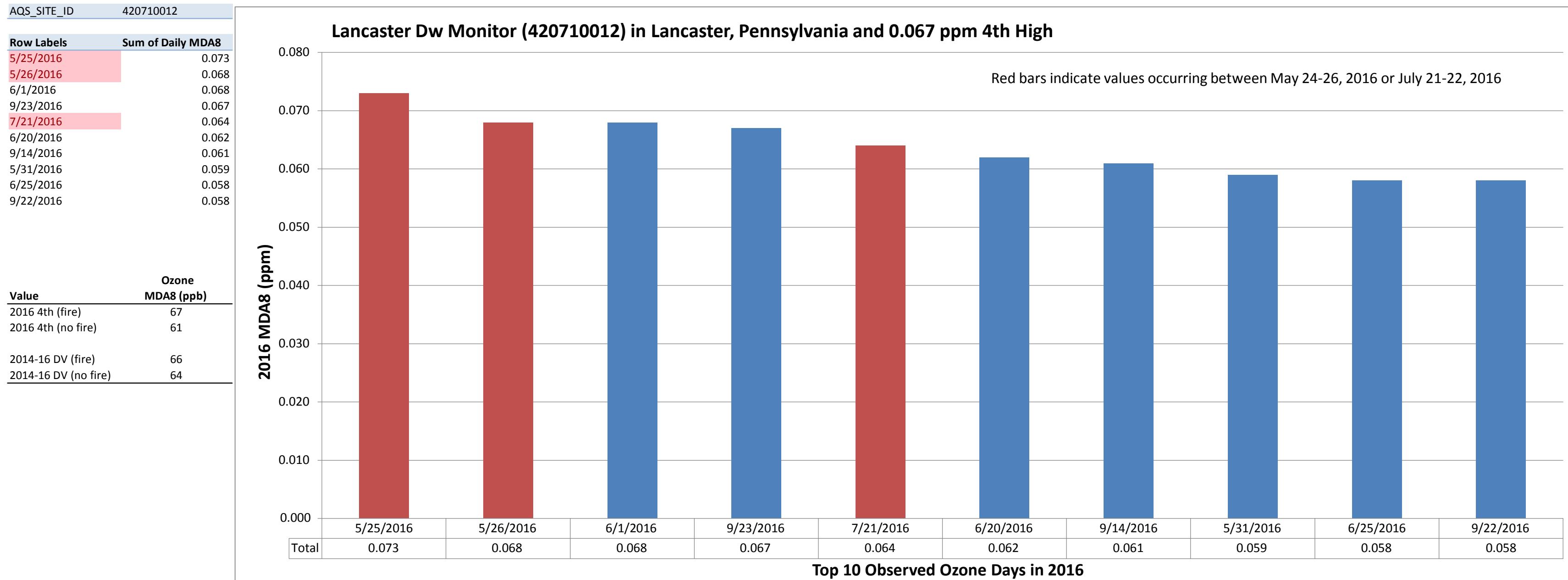




AQS_SITE_ID	420710007
Row Labels	Sum of Daily MDA8
5/25/2016	0.081
5/26/2016	0.080
9/23/2016	0.074
6/1/2016	0.071
6/11/2016	0.067
7/21/2016	0.066
7/22/2016	0.064
6/20/2016	0.064
7/6/2016	0.063
7/26/2016	0.063

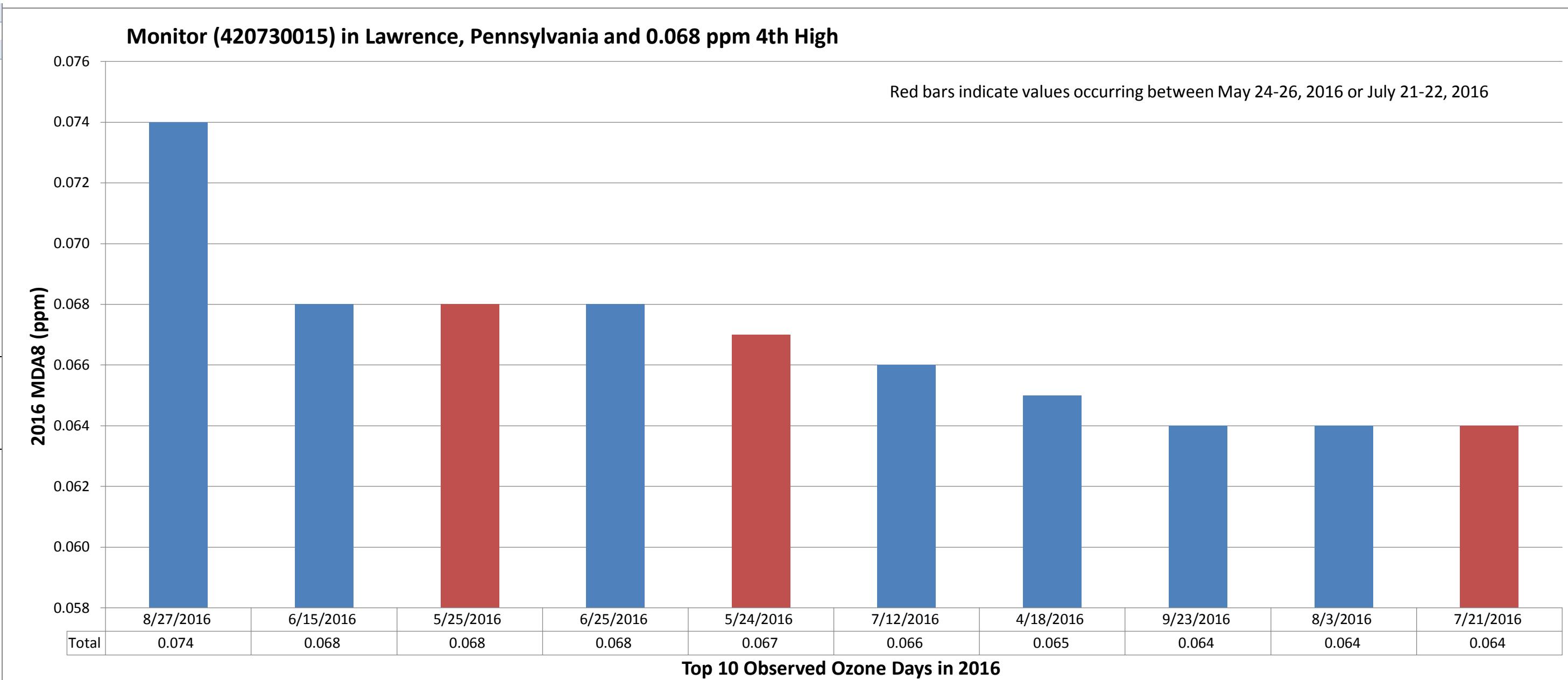
Value	Ozone MDA8 (ppb)
2016 4th (fire)	71
2016 4th (no fire)	64
2014-16 DV (fire)	69
2014-16 DV (no fire)	67





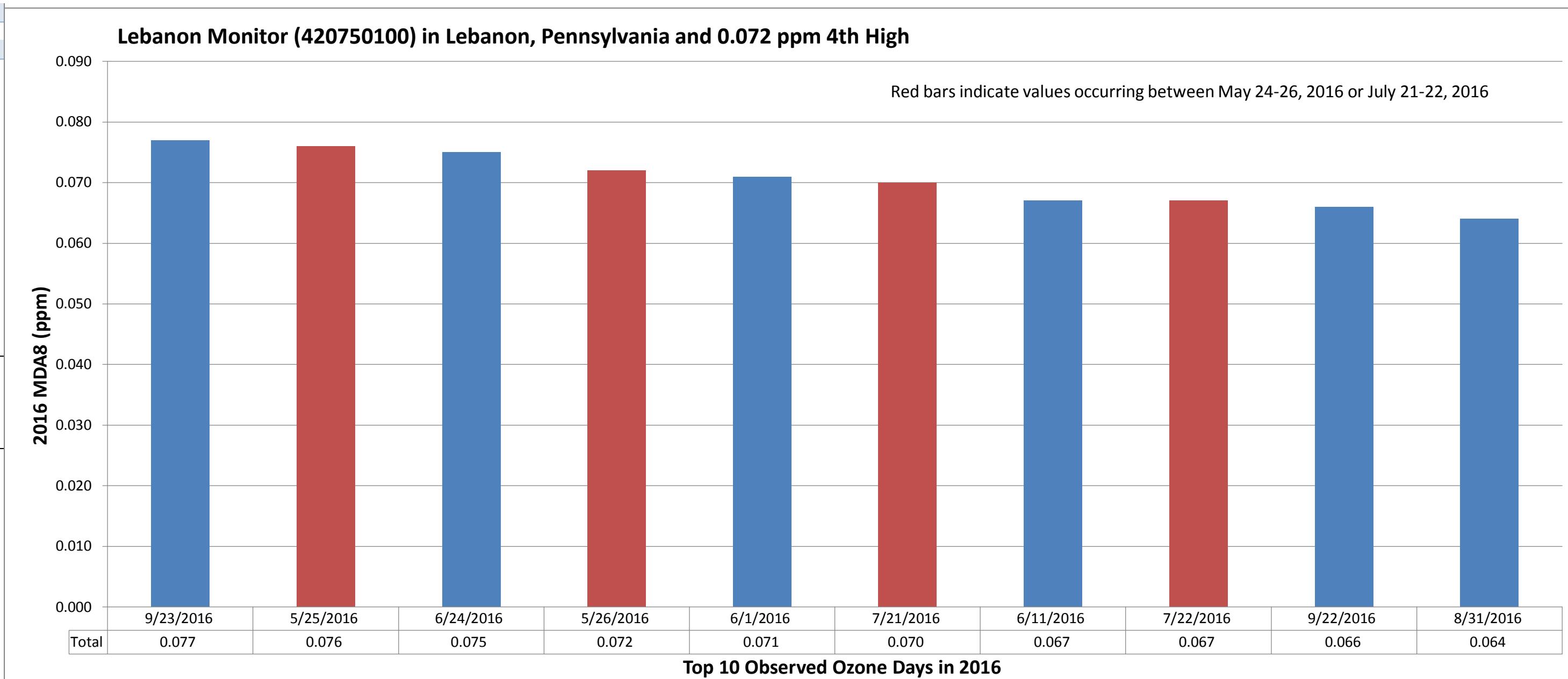
AQS_SITE_ID	420730015
Row Labels	Sum of Daily MDA8
8/27/2016	0.074
6/15/2016	0.068
5/25/2016	0.068
6/25/2016	0.068
5/24/2016	0.067
7/12/2016	0.066
4/18/2016	0.065
9/23/2016	0.064
8/3/2016	0.064
7/21/2016	0.064

Value	Ozone MDA8 (ppb)
2016 4th (fire)	68
2016 4th (no fire)	66
2014-16 DV (fire)	68
2014-16 DV (no fire)	67



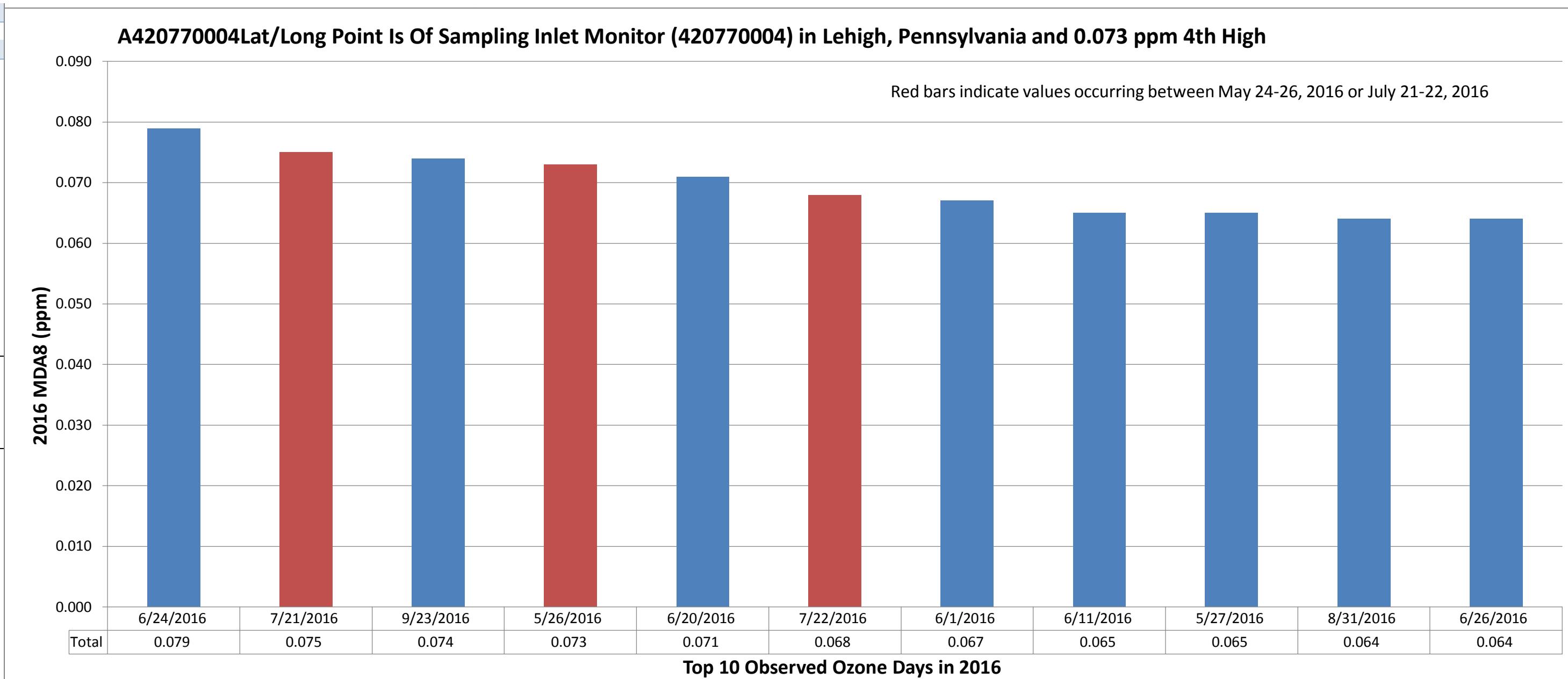
AQS_SITE_ID	420750100
Row Labels	Sum of Daily MDA8
9/23/2016	0.077
5/25/2016	0.076
6/24/2016	0.075
5/26/2016	0.072
6/1/2016	0.071
7/21/2016	0.070
6/11/2016	0.067
7/22/2016	0.067
9/22/2016	0.066
8/31/2016	0.064

Value	Ozone MDA8 (ppb)
2016 4th (fire)	72
2016 4th (no fire)	67
2014-16 DV (fire)	71
2014-16 DV (no fire)	69



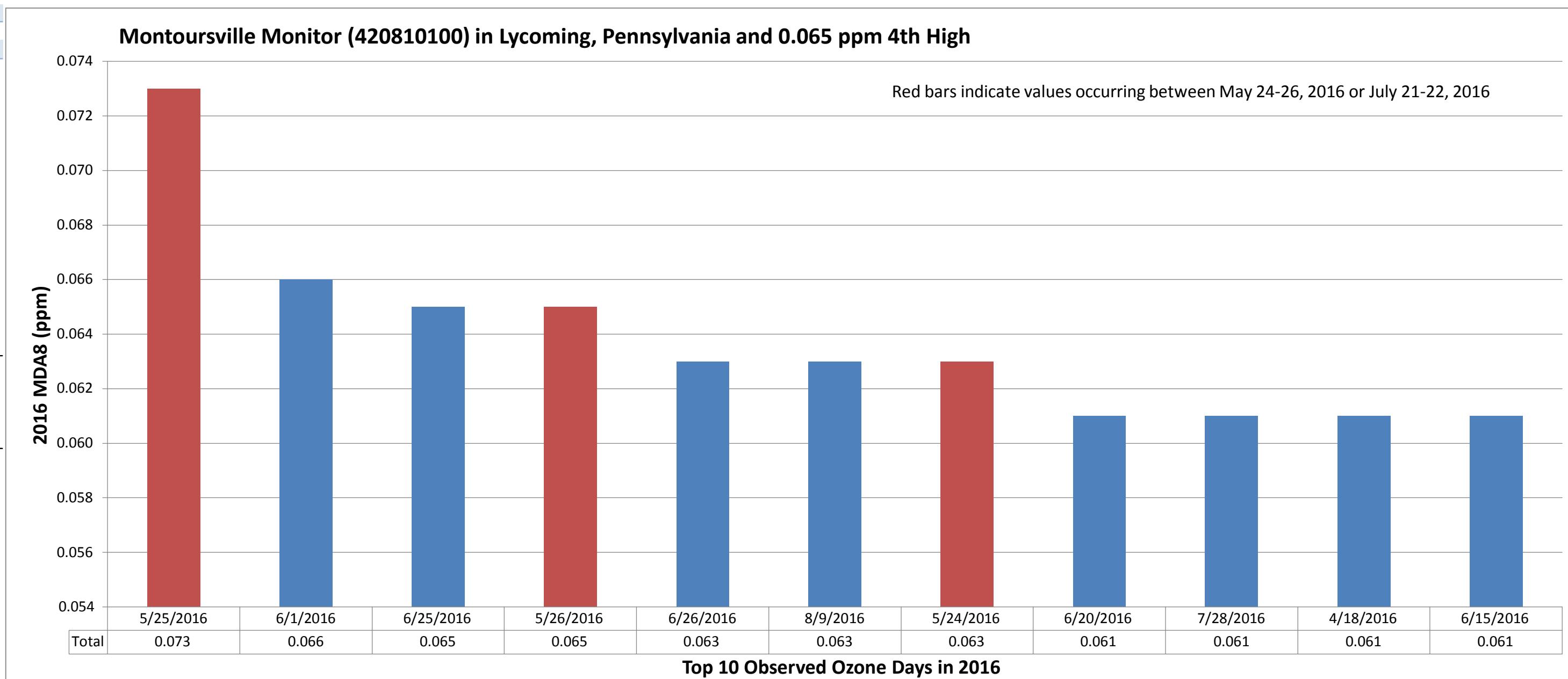
AQS_SITE_ID	420770004
Row Labels	Sum of Daily MDA8
6/24/2016	0.079
7/21/2016	0.075
9/23/2016	0.074
5/26/2016	0.073
6/20/2016	0.071
7/22/2016	0.068
6/1/2016	0.067
6/11/2016	0.065
5/27/2016	0.065
8/31/2016	0.064
6/26/2016	0.064

Value	Ozone MDA8 (ppb)
2016 4th (fire)	73
2016 4th (no fire)	67
2014-16 DV (fire)	70
2014-16 DV (no fire)	68



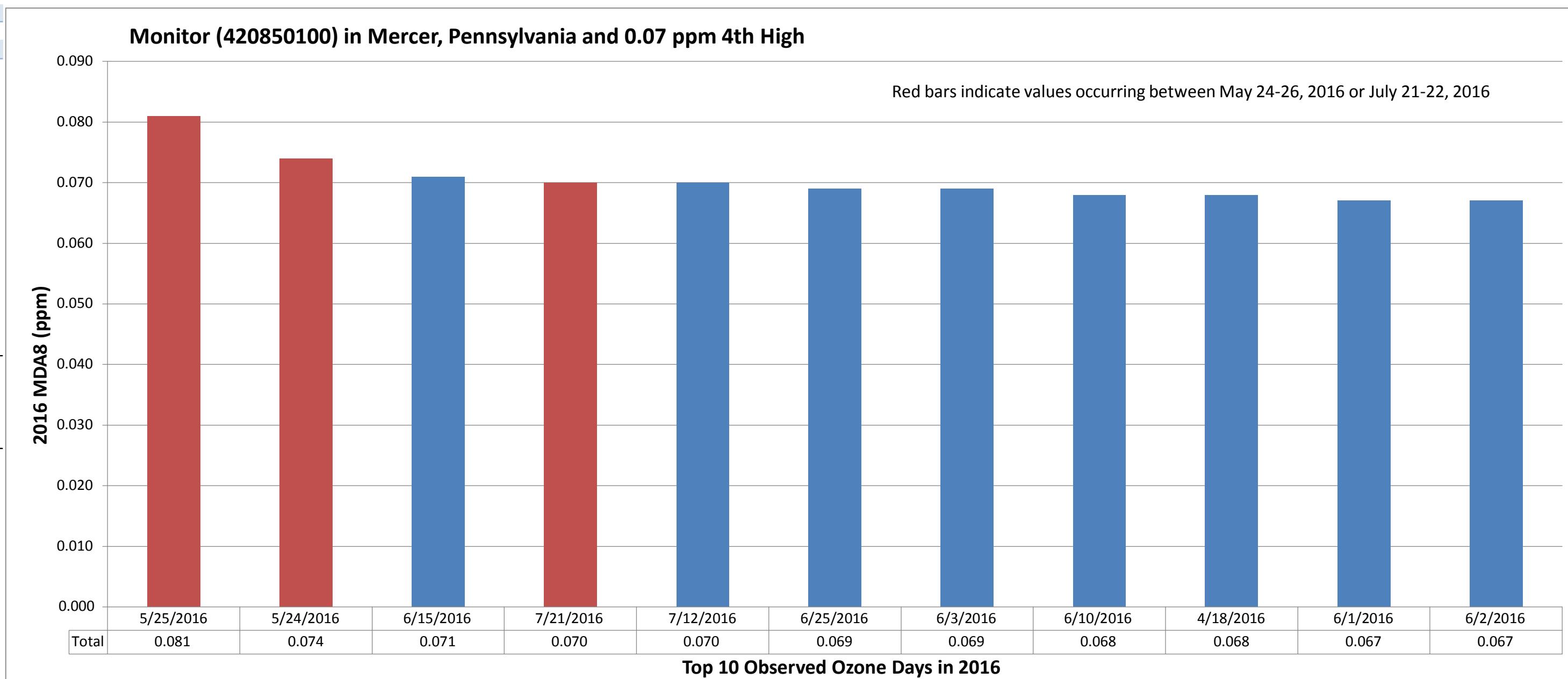
AQS_SITE_ID	420810100
Row Labels	Sum of Daily MDA8
5/25/2016	0.073
6/1/2016	0.066
6/25/2016	0.065
5/26/2016	0.065
6/26/2016	0.063
8/9/2016	0.063
5/24/2016	0.063
6/20/2016	0.061
7/28/2016	0.061
4/18/2016	0.061
6/15/2016	0.061

Value	Ozone MDA8 (ppb)
2016 4th (fire)	65
2016 4th (no fire)	63
2014-16 DV (fire)	64
2014-16 DV (no fire)	63



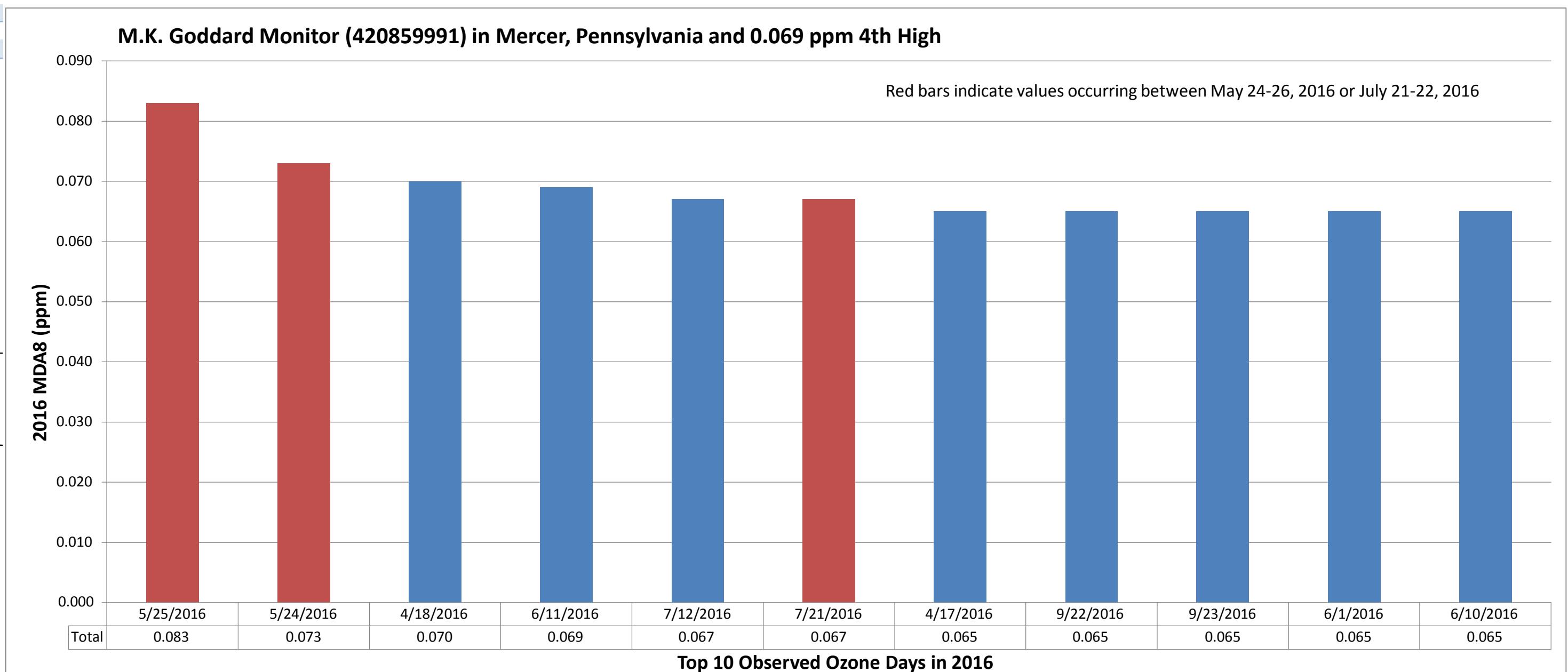
AQS_SITE_ID	420850100
Row Labels	Sum of Daily MDA8
5/25/2016	0.081
5/24/2016	0.074
6/15/2016	0.071
7/21/2016	0.070
7/12/2016	0.070
6/25/2016	0.069
6/3/2016	0.069
6/10/2016	0.068
4/18/2016	0.068
6/1/2016	0.067
6/2/2016	0.067

Value	Ozone MDA8 (ppb)
2016 4th (fire)	70
2016 4th (no fire)	69
2014-16 DV (fire)	69
2014-16 DV (no fire)	68



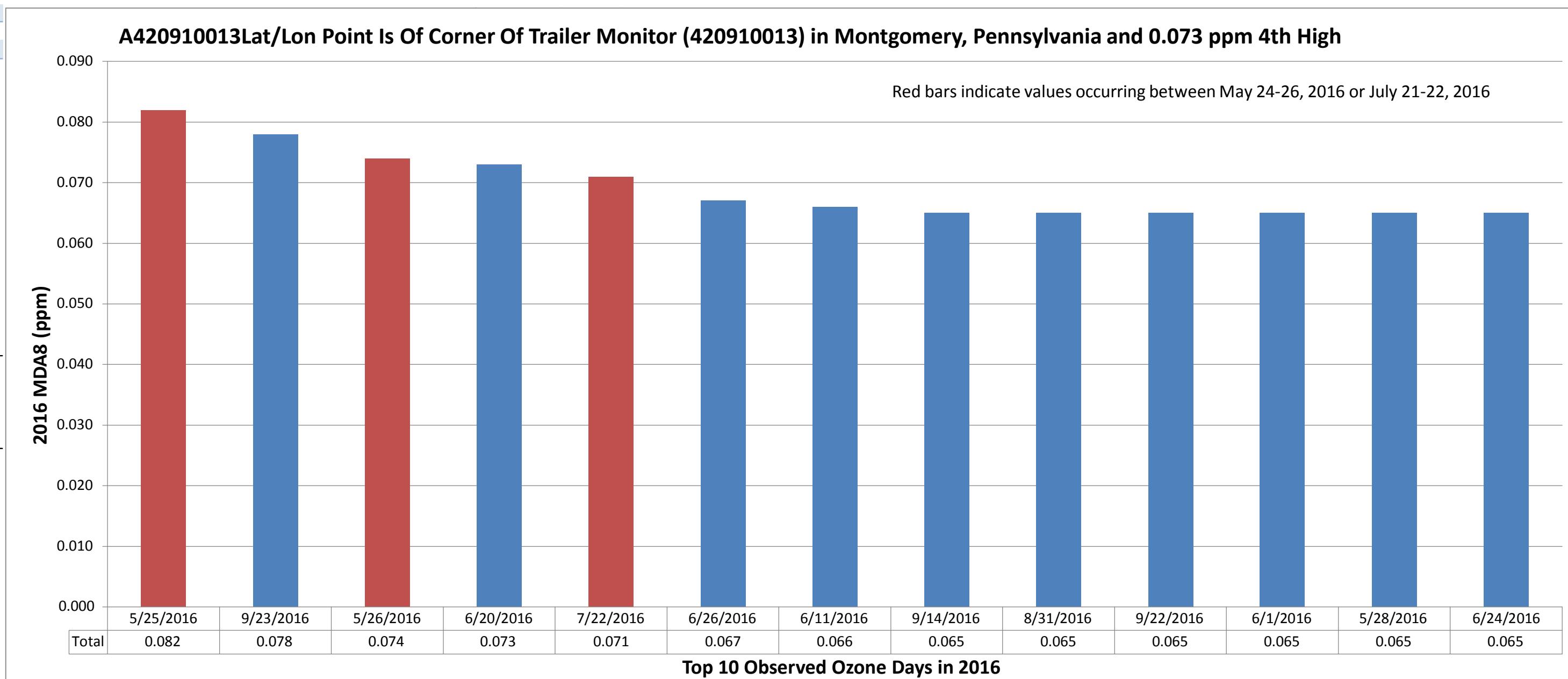
AQS_SITE_ID	420859991
Row Labels	Sum of Daily MDA8
5/25/2016	0.083
5/24/2016	0.073
4/18/2016	0.070
6/11/2016	0.069
7/12/2016	0.067
7/21/2016	0.067
4/17/2016	0.065
9/22/2016	0.065
9/23/2016	0.065
6/1/2016	0.065
6/10/2016	0.065

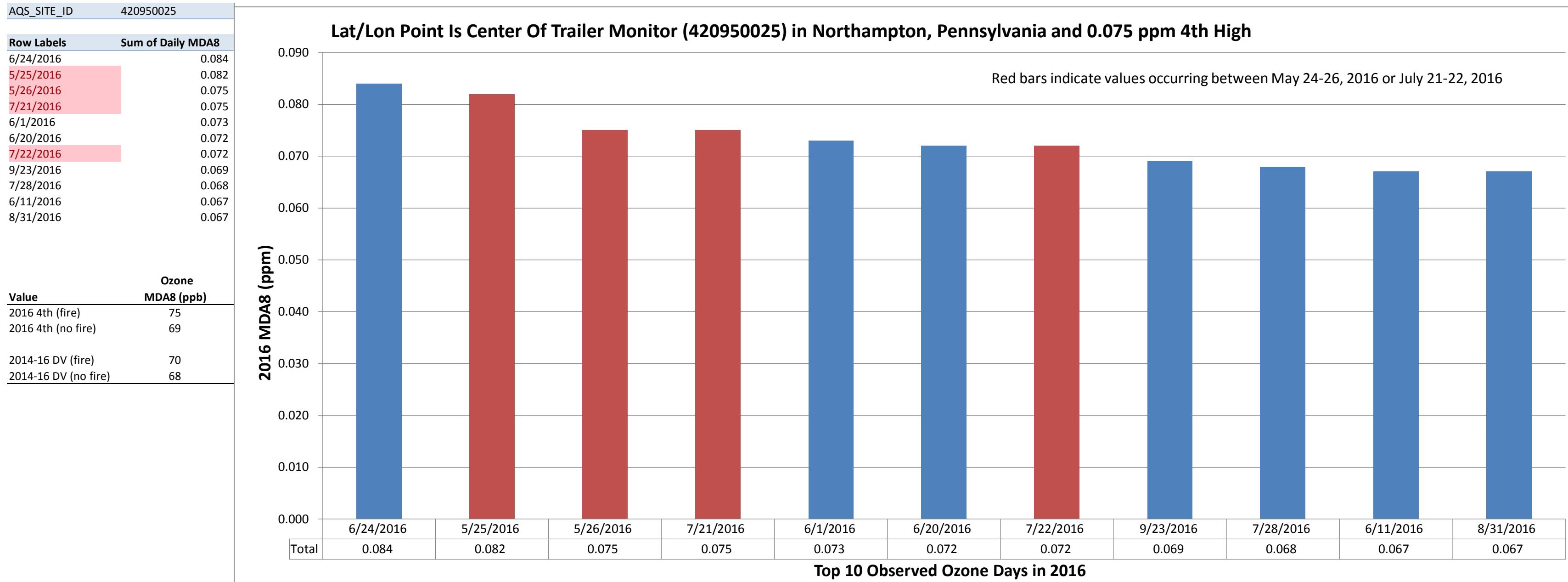
Value	Ozone MDA8 (ppb)
2016 4th (fire)	69
2016 4th (no fire)	65
2014-16 DV (fire)	65
2014-16 DV (no fire)	64

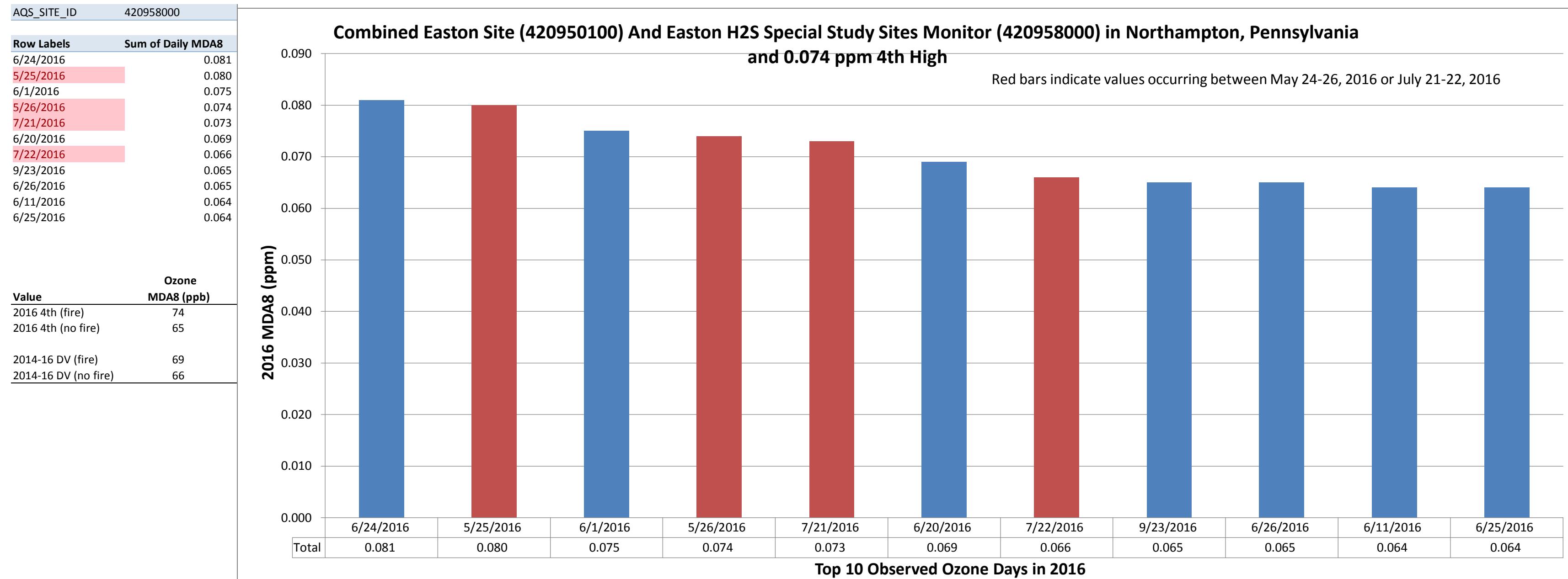


AQS_SITE_ID	420910013
Row Labels	Sum of Daily MDA8
5/25/2016	0.082
9/23/2016	0.078
5/26/2016	0.074
6/20/2016	0.073
7/22/2016	0.071
6/26/2016	0.067
6/11/2016	0.066
9/14/2016	0.065
8/31/2016	0.065
9/22/2016	0.065
6/1/2016	0.065
5/28/2016	0.065
6/24/2016	0.065

Value	Ozone MDA8 (ppb)
2016 4th (fire)	73
2016 4th (no fire)	66
2014-16 DV (fire)	72
2014-16 DV (no fire)	70

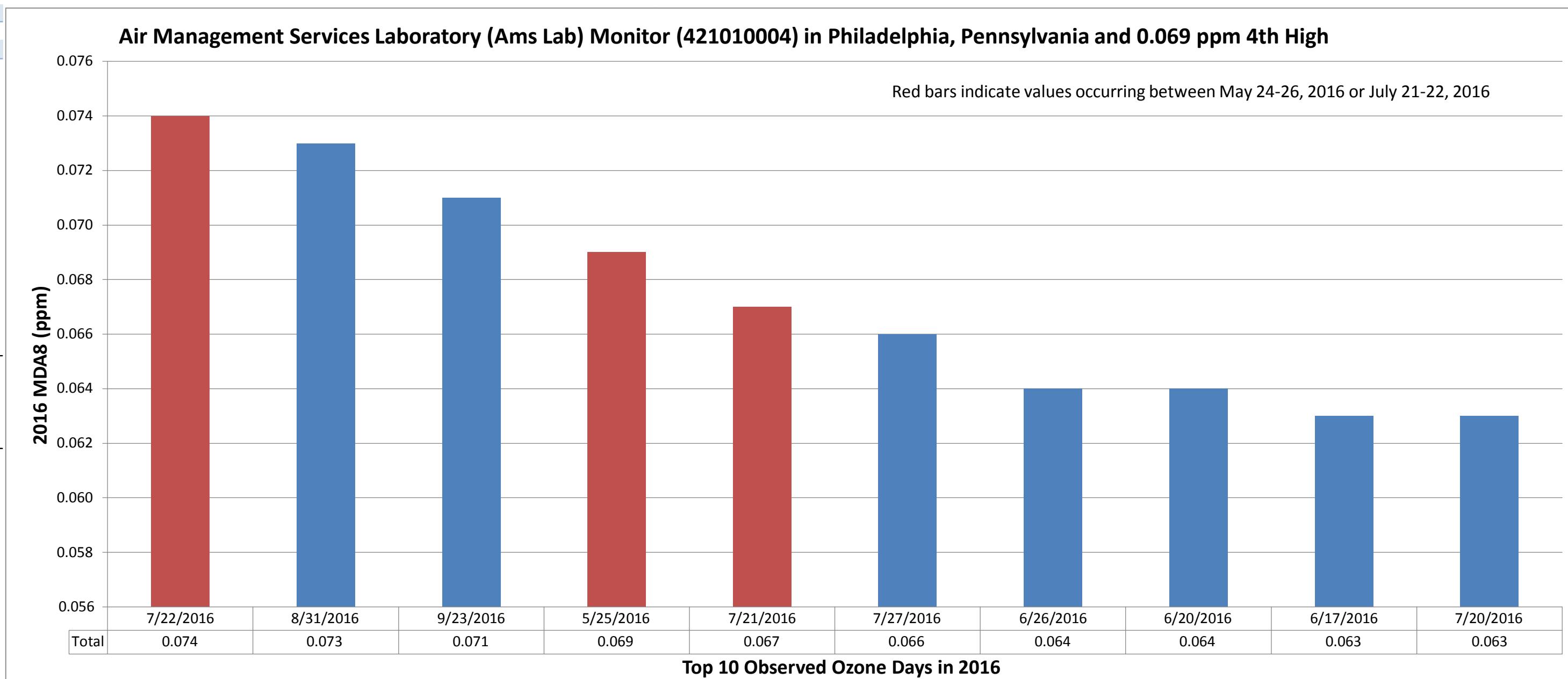






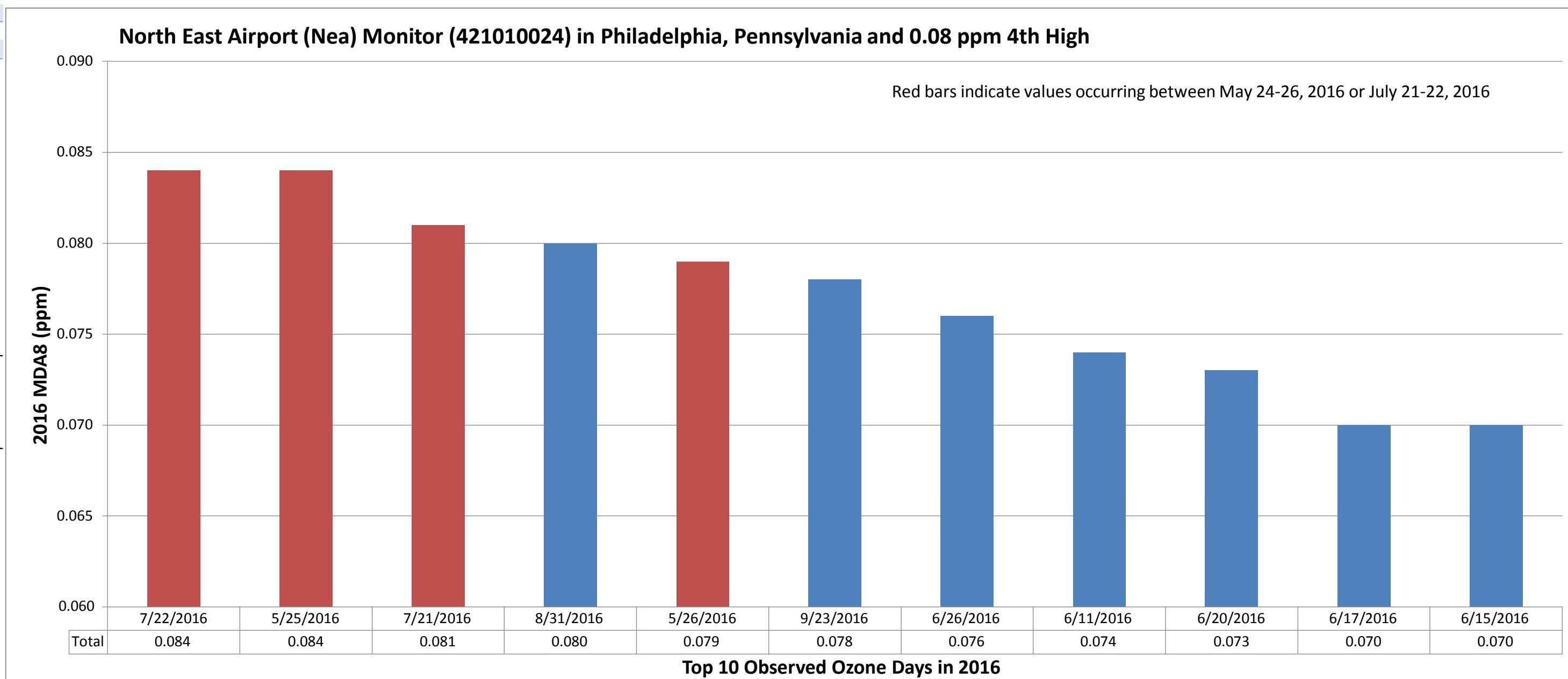
AQS_SITE_ID	421010004
Row Labels	Sum of Daily MDA8
7/22/2016	0.074
8/31/2016	0.073
9/23/2016	0.071
5/25/2016	0.069
7/21/2016	0.067
7/27/2016	0.066
6/26/2016	0.064
6/20/2016	0.064
6/17/2016	0.063
7/20/2016	0.063

Value	Ozone MDA8 (ppb)
2016 4th (fire)	69
2016 4th (no fire)	64
2014-16 DV (fire)	61
2014-16 DV (no fire)	59



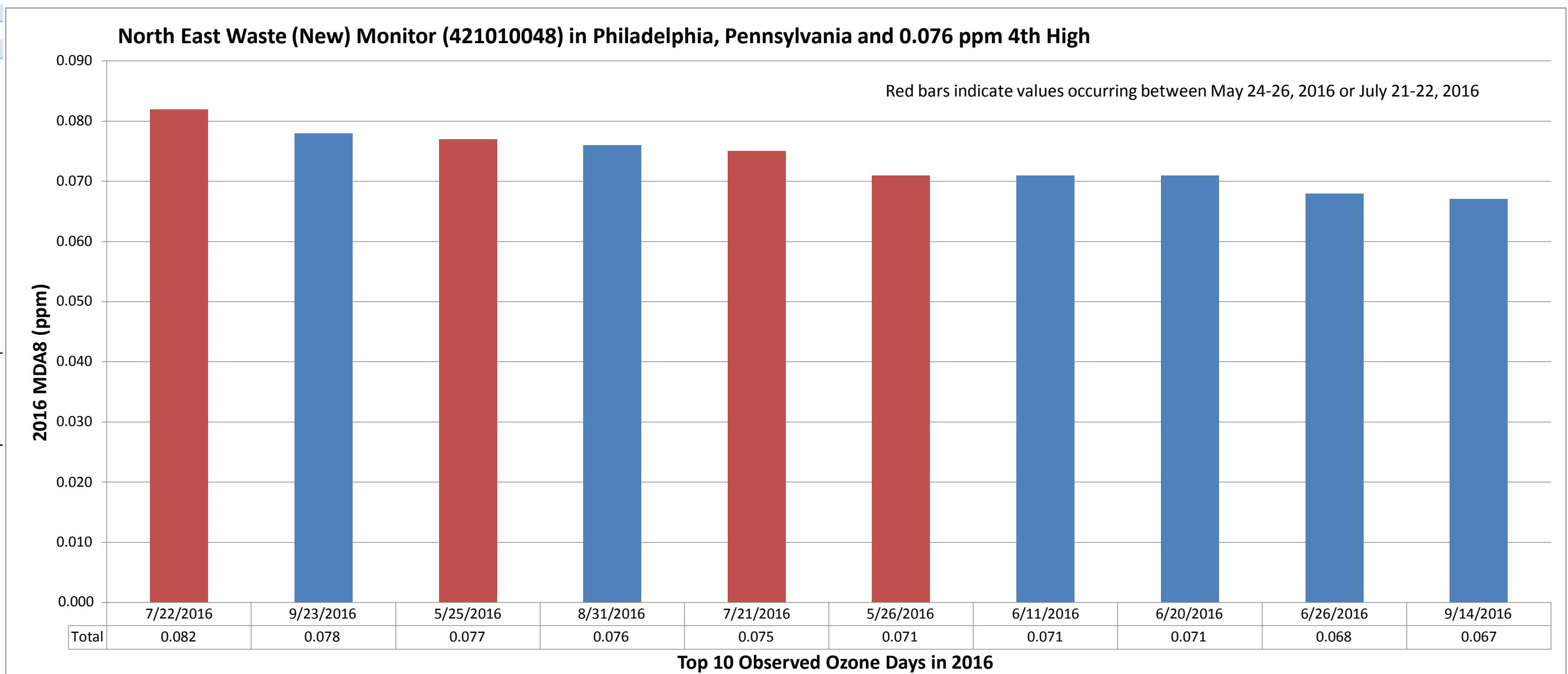
AQS_SITE_ID	421010024
Row Labels	Sum of Daily MDA8
7/22/2016	0.084
5/25/2016	0.084
7/21/2016	0.081
8/31/2016	0.080
5/26/2016	0.079
9/23/2016	0.078
6/26/2016	0.076
6/11/2016	0.074
6/20/2016	0.073
6/17/2016	0.070
6/15/2016	0.070

Value	Ozone MDA8 (ppb)
2016 4th (fire)	80
2016 4th (no fire)	74
2014-16 DV (fire)	77
2014-16 DV (no fire)	75



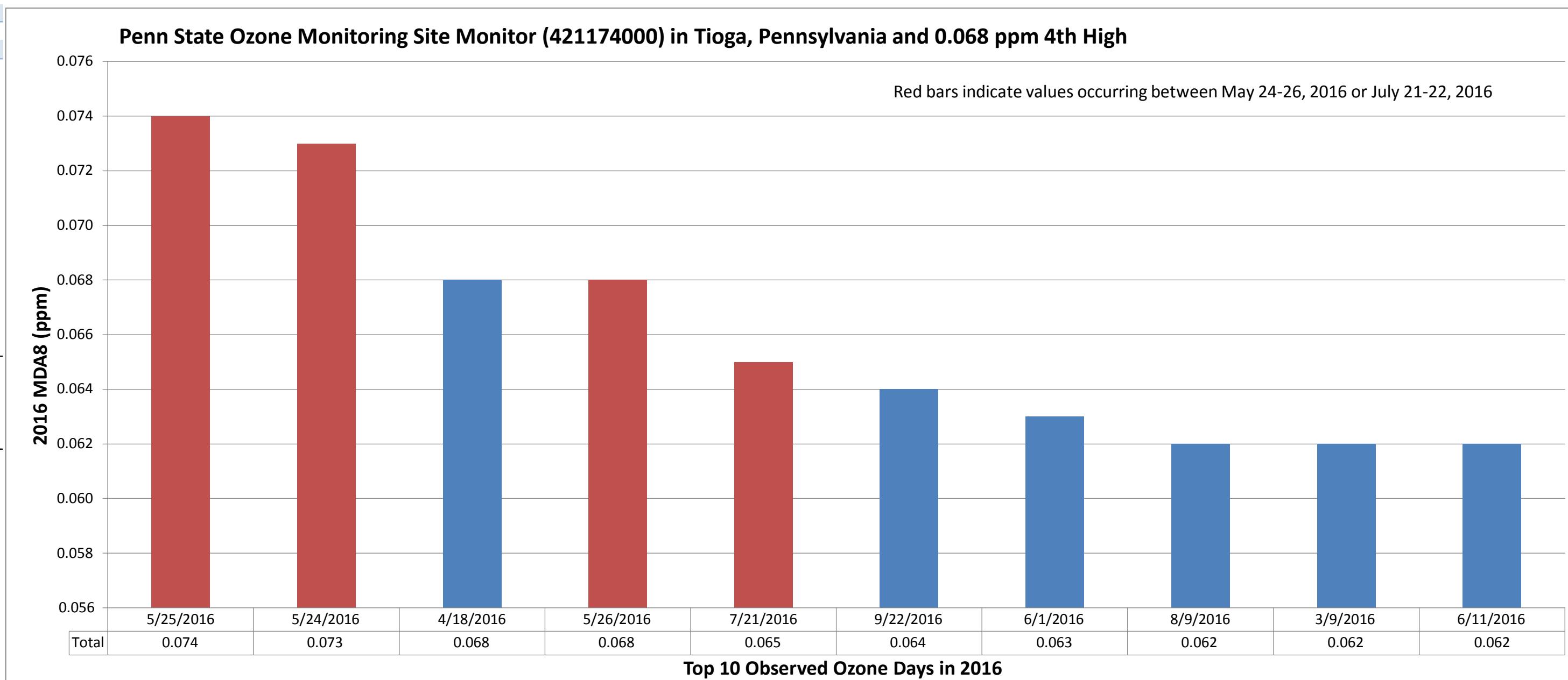
AQS_SITE_ID	421010048
Row Labels	Sum of Daily MDA8
7/22/2016	0.082
9/23/2016	0.078
5/25/2016	0.077
8/31/2016	0.076
7/21/2016	0.075
5/26/2016	0.071
6/11/2016	0.071
6/20/2016	0.071
6/26/2016	0.068
9/14/2016	0.067

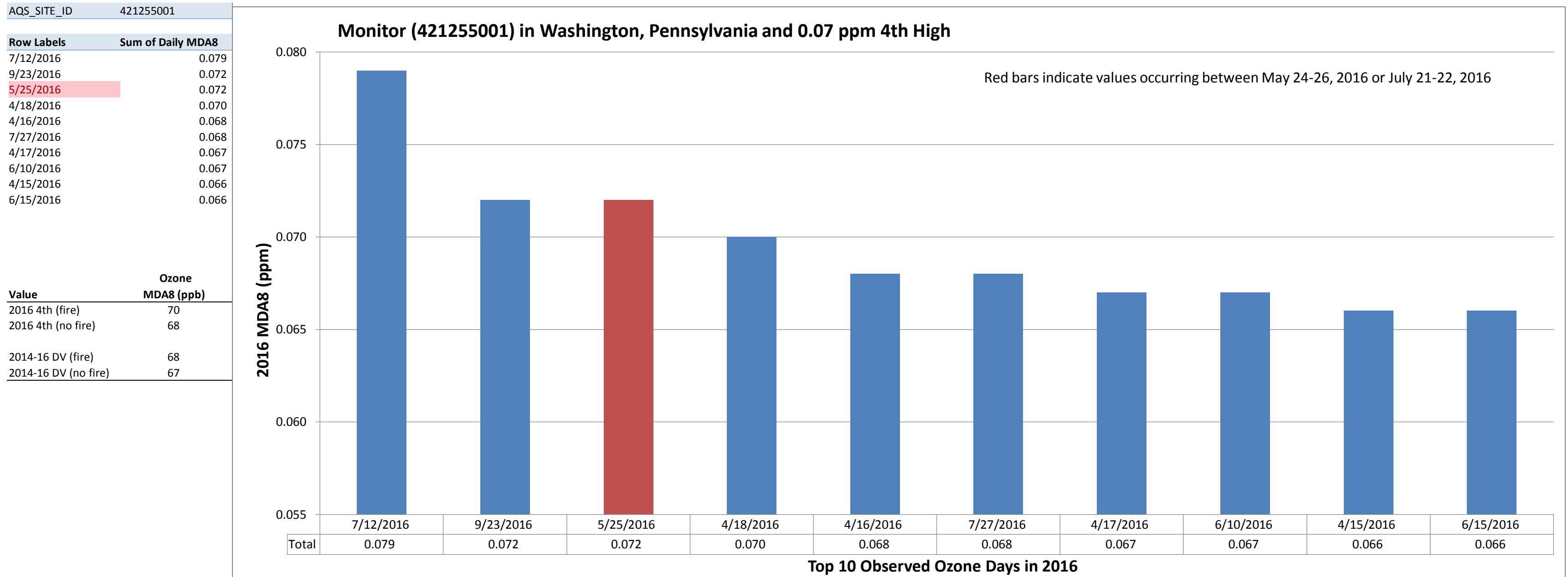
Value	Ozone MDA8 (ppb)
2016 4th (fire)	76
2016 4th (no fire)	71
2014-16 DV (fire)	74
2014-16 DV (no fire)	72

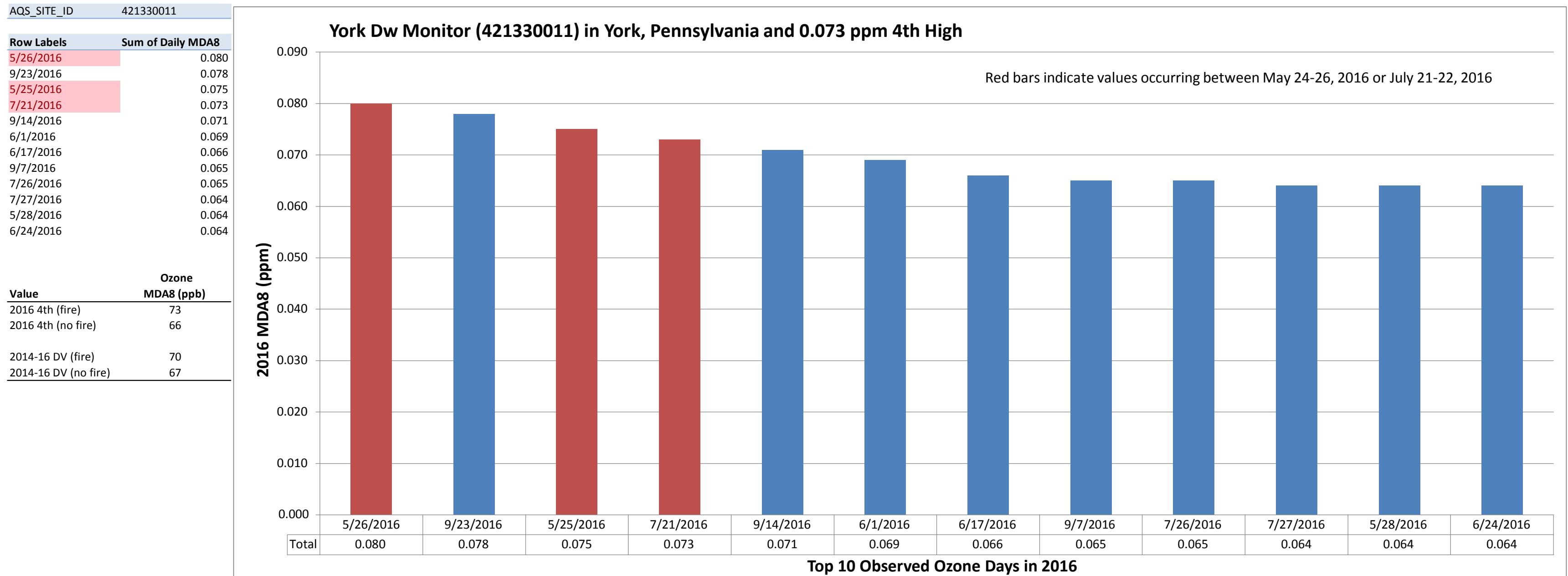


AQS_SITE_ID	421174000
Row Labels	Sum of Daily MDA8
5/25/2016	0.074
5/24/2016	0.073
4/18/2016	0.068
5/26/2016	0.068
7/21/2016	0.065
9/22/2016	0.064
6/1/2016	0.063
8/9/2016	0.062
3/9/2016	0.062
6/11/2016	0.062

Value	Ozone MDA8 (ppb)
2016 4th (fire)	68
2016 4th (no fire)	62
2014-16 DV (fire)	63
2014-16 DV (no fire)	61







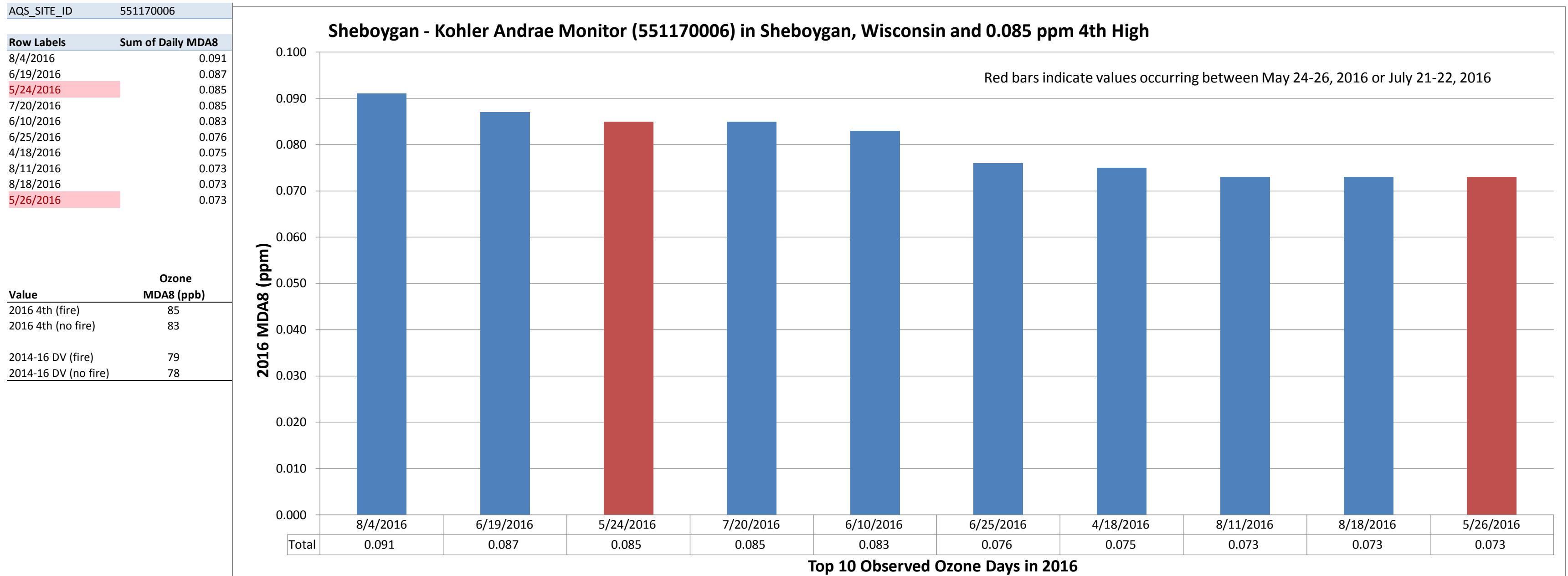


EXHIBIT B

Monitor Status

State Name	County Name	Local Site Name	2014-2016 Design Value (ppm)	No Fire 2014-2016 Design Value (ppm)	EPA Accepted 2014-2106 Design Value (ppm)	2014 4th Highest Daily Max Value	2015 4th Highest Daily Max Value	2016 4th Highest Daily Max Value	2016 4th Highest Daily Max Value (No Fire Dates)	2014-2016 DV Delta (ppb)
Connecticut	Fairfield	Greenwich Point Park	0.080	0.079	0.080	0.078	0.084	0.079	0.077	1
Connecticut	Fairfield	Western Conn State Univ	0.078	0.077	0.078	0.074	0.079	0.081	0.080	1
Connecticut	Fairfield		0.081	0.079	0.081	0.074	0.086	0.083	0.079	2
Connecticut	Fairfield	Sherwood Island Connector (see coordinates)	0.085	0.082	0.083	0.081	0.087	0.087	0.079	3
Connecticut	Hartford	McAuliffe Park	0.075	0.074	0.074	0.077	0.075	0.075	0.071	1
Connecticut	Litchfield	Mohawk Mt-Cornwall	0.074	0.072	0.072	0.068	0.076	0.078	0.074	2
Connecticut	Middlesex		0.079	0.077	0.079	0.080	0.078	0.080	0.075	2
Connecticut	New Haven	Criscuolo Park-New Haven	0.076	0.075	0.076	0.072	0.081	0.075	0.073	1
Connecticut	New Haven	Hammonasset State Park	0.076	0.075	0.076	0.069	0.081	0.080	0.077	1
Connecticut	New London	Fort Griswold Park	0.072	0.072	0.072	0.065	0.077	0.075	0.075	0
Connecticut	Tolland		0.073	0.072	0.073	0.077	0.072	0.072	0.067	1
Connecticut	Windham	Abington	0.070	0.068	0.068	0.067	0.070	0.074	0.067	2
Illinois	Adams	JOHN WOOD COMMUNITY COLLEGE	0.062	0.062	0.061	0.064	0.061	0.061	0.061	0
Illinois	Champaign	BOOKER T. WASHINGTON ES	0.063	0.063	0.062	0.062	0.066	0.066	0.065	0
Illinois	Champaign	ISWS CLIMATE STATION	0.066	0.066	0.068	0.065	0.066	0.066	0.066	0
Illinois	Clark	416 S. State St. Hwy 1- West Union	0.064	0.064	0.063	0.064	0.066	0.066	0.066	0
Illinois	Cook	VILLAGE GARAGE	0.069	0.069	0.066	0.066	0.066	0.075	0.075	0
Illinois	Cook	SOUTH WATER FILTRATION PLANT	0.070	0.069	0.067	0.066	0.077	0.076	0.076	1
Illinois	Cook	COM ED MAINTENANCE BLDG	0.069	0.069	0.067	0.065	0.065	0.075	0.075	0
Illinois	Cook	TAFT HS	0.069	0.069	0.065	0.068	0.075	0.074	0.074	0
Illinois	Cook	COOK COUNTY TRAILER	0.069	0.069	0.070	0.066	0.073	0.071	0.071	0
Illinois	Cook	IEPA TRAILER	0.062	0.062	0.063	0.058	0.067	0.067	0.067	0
Illinois	Cook	COOK COUNTY TRAILER	0.066	0.066	0.063	0.061	0.076	0.076	0.076	0
Illinois	Cook	REGIONAL OFFICE BUILDING	0.071	0.071	0.069	0.068	0.076	0.076	0.076	0
Illinois	Cook	NORTHBROOK WATER PLANT	0.071	0.071	0.068	0.068	0.079	0.078	0.078	0
Illinois	Cook	WATER PLANT	0.072	0.072	0.072	0.070	0.076	0.074	0.074	0
Illinois	DuPage	MORTON ARBORETUM	0.068	0.068	0.064	0.067	0.074	0.074	0.074	0
Illinois	Effingham	CENTRAL JR HIGH	0.064	0.064	0.063	0.064	0.066	0.066	0.066	0
Illinois	Hamilton	TEN MILE CREEK DNR OFFICE	0.065	0.065	0.063	0.064	0.068	0.068	0.068	0
Illinois	Jersey	ILLINI JR HIGH	0.068	0.068	0.068	0.065	0.074	0.074	0.074	0
Illinois	Jo Daviess	Stockton	0.065	0.065	0.067	0.062	0.067	0.067	0.067	0
Illinois	Kane	LARSEN JUNIOR HIGH	0.068	0.068	0.066	0.065	0.074	0.074	0.074	0
Illinois	Lake	CAMP LOGAN TRAILER	0.073	0.073	0.073	0.070	0.077	0.076	0.076	0
Illinois	McHenry	CARY GROVE HS	0.068	0.068	0.067	0.064	0.073	0.073	0.073	0
Illinois	McLean	ISU HARRIS PHYSICAL PLANT	0.064	0.064	0.066	0.063	0.065	0.065	0.065	0
Illinois	Macon	IEPA TRAILER	0.066	0.066	0.067	0.066	0.066	0.066	0.066	0
Illinois	Macoupin	IEPA TRAILER	0.064	0.064	0.064	0.063	0.067	0.067	0.067	0
Illinois	Madison	CLARA BARTON SCHOOL	0.071	0.071	0.071	0.072	0.073	0.073	0.073	0
Illinois	Madison	SOUTHWEST CABLE TV	0.067	0.067	0.067	0.070	0.064	0.067	0.067	0
Illinois	Madison	WATER PLANT	0.071	0.071	0.071	0.070	0.069	0.075	0.075	0
Illinois	Madison	Alhambra	0.067	0.067	0.067	0.068	0.067	0.068	0.068	0
Illinois	Peoria	FIRESTATION	0.064	0.064	0.064	0.060	0.068	0.068	0.068	0
Illinois	Peoria	PEORIA HEIGHTS HS	0.064	0.064	0.064	0.064	0.066	0.066	0.066	0
Illinois	Randolph	IEPA TRAILER	0.067	0.067	0.071	0.065	0.066	0.066	0.066	0
Illinois	Rock Island	ROCK ISLAND ARSENAL	0.062	0.062	0.062	0.060	0.064	0.064	0.064	0
Illinois	Saint Clair	IEPA-RAPS TRAILER	0.068	0.068	0.068	0.067	0.066	0.073	0.073	0
Illinois	Sangamon	Illinois Building State Fairgrounds	0.063	0.063	0.059	0.064	0.068	0.068	0.068	0
Illinois	Will	COM ED TRAINING CENTER	0.064	0.064	0.064	0.064	0.064	0.064	0.064	0
Illinois	Winnebago	MAPLE ELEMENTARY SCHOOL	0.068	0.068	0.070	0.066	0.070	0.070	0.07	0
Indiana	Allen	Leo High School	0.063	0.063	0.063	0.062	0.066	0.066	0.066	0

Monitor Status

State Name	County Name	Local Site Name	2014-2016 Design Value (ppm)	No Fire 2014-2016 Design Value (ppm)	EPA Accepted 2014-2106 Design Value (ppm)	2014 4th Highest Daily Max Value	2015 4th Highest Daily Max Value	2016 4th Highest Daily Max Value	2016 4th Highest Daily Max Value (No Fire Dates)	2014-2016 DV Delta (ppb)
Indiana	Allen	Ft. Wayne- Beacon St.	0.063	0.063	0.063	0.059	0.069	0.068	0.068	0
Indiana	Bartholomew	Hope- Hauser Jr-Sr High School	0.068	0.068	0.067	0.066	0.071	0.071	0.071	0
Indiana	Boone	Perry Worth ELEMENTRY SCHOOL, WEST OF WHITESTOWN	0.066	0.066	0.066	0.064	0.070	0.069	0.069	0
Indiana	Brown	Helmsburg	0.061	0.060	0.058	0.062	0.063	0.062	0.062	1
Indiana	Carroll	Flora-Flora Airport	0.064	0.064	0.064	0.064	0.066	0.066	0.066	0
Indiana	Clark	Charlestown State Park- 1051.8 meters East of SR 62/ Indiana armory	0.070	0.070	0.066	0.074	0.072	0.072	0.072	0
Indiana	Delaware	Albany- Albany Elem. Sch.	0.059	0.059	0.054	0.058	0.067	0.066	0.066	0
Indiana	Elkhart	Bristol- Bristol Elem. Sch.	0.061	0.061	0.055	0.058	0.072	0.072	0.072	0
Indiana	Floyd	New Albany- Green Valley Elem. Sch.	0.069	0.069	0.068	0.067	0.073	0.073	0.073	0
Indiana	Greene	Plummer, 2500 S. W- Citizens gas Plummer maintenance facility	0.066	0.066	0.064	0.067	0.069	0.068	0.068	0
Indiana	Hamilton	Our Lady of Grace- Noblesville	0.063	0.063	0.058	0.063	0.069	0.069	0.069	0
Indiana	Hendricks	AVON- 255 S. SR 267 (also 255 S. Avon Ave.) Avon, IN	0.060	0.059	0.057	0.055	0.068	0.066	0.066	1
Indiana	Huntington	Roanoke- Roanoke Elem. School	0.058	0.058	0.056	0.054	0.066	0.065	0.065	0
Indiana	Jackson	Brownstown- 225 W & 200 N. Water facility	0.066	0.066	0.064	0.064	0.070	0.070	0.070	0
Indiana	Johnson	Indian Creek Elementary School in Trafalgar, DUE SOUTH OF INDIANAPOLIS	0.060	0.060	0.056	0.063	0.062	0.062	0.062	0
Indiana	Knox	Vincennes	0.065	0.065	0.062	0.063	0.071	0.071	0.071	0
Indiana	Lake	Gary-ITRI/ 1219.5 meters east of Tennessee St.- old ammunition bunker	0.067	0.067	0.067	0.064	0.070	0.070	0.070	0
Indiana	Lake	HAMMOND CAAP- Hammond- 141st St.	0.065	0.065	0.067	0.060	0.068	0.068	0.068	0
Indiana	LaPorte	LAPORTE OZONE SITE AT WATER TREATMENT PLANT	0.063	0.062	0.061	0.061	0.068	0.068	0.065	1
Indiana	Madison	SCHOOL LOCATED ON THE SW CORNER OF US 36 AND IND 109	0.057	0.057	0.054	0.054	0.064	0.064	0.064	0
Indiana	Marion	Indpls.- Ft. Harrison	0.069	0.069	0.066	0.069	0.073	0.073	0.073	0
Indiana	Marion	Indpls- Harding St.	0.065	0.065	0.066	0.061	0.069	0.069	0.069	0
Indiana	Marion	Indpls.- E. 16th St.	0.065	0.065	0.065	0.062	0.068	0.068	0.068	0
Indiana	Marion	Indpls- Washington Park/ in parking lot next to police station	0.066	0.066	0.061	0.067	0.070	0.070	0.070	0
Indiana	Marion	Indpls.- I 70	0.064	0.063	0.061	0.064	0.068	0.068	0.065	1
Indiana	Morgan	Monrovia- Monrovia HS.	0.064	0.063	0.064	0.063	0.065	0.064	0.064	1
Indiana	Perry	Leopold- Perry Central HS	0.067	0.067	0.067	0.067	0.069	0.069	0.069	0
Indiana	Porter	Ogden Dunes- Water Treatment Plant	0.069	0.068	0.071	0.066	0.070	0.069	0.069	1
Indiana	Porter	VALPARAISO	0.066	0.065	0.067	0.060	0.071	0.069	0.069	1
Indiana	Posey	ST. PHILLIPS- St. Phillips road CAAP trailer	0.066	0.066	0.065	0.067	0.068	0.068	0.068	0
Indiana	St. Joseph	Potato Creek State Park	0.062	0.061	0.059	0.058	0.069	0.066	0.066	1
Indiana	St. Joseph	South Bend-Shields Dr.	0.068	0.068	0.067	0.066	0.072	0.071	0.071	0
Indiana	St. Joseph	Granger-Beckley St.	0.066	0.066	0.064	0.064	0.071	0.071	0.071	0
Indiana	Shelby	TRITON Middle SCHOOL, NORTH OF FAIRLAND	0.062	0.062	0.062	0.059	0.065	0.065	0.065	0
Indiana	Vanderburgh	Inglefield/ Scott School	0.069	0.069	0.070	0.068	0.070	0.070	0.070	0
Indiana	Vanderburgh	Evansville- Buena Vista	0.070	0.070	0.068	0.072	0.072	0.072	0.072	0
Indiana	Vigo	TERRE HAUTE CAAP/ McLean High School	0.065	0.065	0.062	0.064	0.069	0.069	0.069	0
Indiana	Vigo	Sandcut/ SITE LOCATED BY HOME BEHIND SHED.	0.061	0.061	0.056	0.062	0.067	0.067	0.067	0
Indiana	Wabash	Salamonie Reservoir	0.068	0.068	0.066	0.068	0.071	0.071	0.071	0
Indiana	Warrick	Boonville- Boonville HS	0.068	0.068	0.065	0.069	0.070	0.070	0.070	0
Indiana	Warrick	Lynnville- Tecumseh HS	0.066	0.066	0.064	0.062	0.072	0.072	0.072	0
Indiana	Warrick	Dayville	0.067	0.067	0.066	0.065	0.071	0.071	0.071	0
Maryland	Anne Arundel	GLEN BURNIE						0.076	0.074	
Maryland	Baltimore	Padonia	0.072	0.072	0.072	0.078	0.073	0.073	0.073	0
Maryland	Baltimore	Essex	0.072	0.072	0.072	0.068	0.078	0.077	0.077	0
Maryland	Baltimore	Hart Miller Island						0.088	0.088	
Maryland	Calvert	Calvert	0.069	0.068	0.069	0.070	0.070	0.068	0.068	1
Maryland	Carroll	South Carroll	0.068	0.066	0.068	0.064	0.070	0.072	0.066	2
Maryland	Cecil	Fair Hill Natural Resource Management Area		0.076	0.074	0.076	0.074	0.080	0.075	2
Maryland	Charles	Southern Maryland		0.070	0.070	0.070	0.070	0.068	0.073	0

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Maryland	Dorchester	Horn Point	0.064	0.064	0.064	0.065	0.061	0.067	0.067	0	
Maryland	Dorchester	Blackwater NWR	0.066	0.065	0.066	0.065	0.065	0.068	0.067	1	
Maryland	Frederick	Frederick Airport	0.067	0.066	0.067	0.063	0.070	0.070	0.066	1	
Maryland	Garrett	Piney Run	0.065	0.065	0.063	0.067	0.066	0.066	0.066	0	
Maryland	Harford	Edgewood	0.073	0.072	0.073	0.067	0.074	0.079	0.077	1	
Maryland	Harford	Aldino	0.073	0.072	0.073	0.070	0.073	0.077	0.074	1	
Maryland	Kent	Millington	0.070	0.069		0.068	0.072	0.072	0.069	1	
Maryland	Montgomery	Rockville	0.068	0.067	0.068	0.064	0.072	0.068	0.065	1	
Maryland	Prince George's	HU-Beltsville	0.069	0.068	0.069	0.065	0.072	0.070	0.069	1	
Maryland	Prince George's	PG Equestrian Center		0.071	0.070	0.071	0.069	0.069	0.076	0.073	
Maryland	Prince George's	Beltsville	0.068	0.067	0.068	0.069	0.067	0.070	0.067	1	
Maryland	Washington	Hagerstown	0.066	0.065	0.066	0.061	0.067	0.070	0.068	1	
Maryland	Baltimore (City)	Furley	0.069	0.066	0.069	0.060	0.072	0.075	0.067	3	
Massachusetts	Barnstable	TRURO NATIONAL SEASHORE	0.065	0.064		0.059	0.071	0.065	0.064	1	
Massachusetts	Bristol	FALL RIVER	0.068	0.065		0.060	0.070	0.076	0.066	3	
Massachusetts	Bristol	FAIRHAVEN2	0.064	0.062		0.058	0.067	0.069	0.062	2	
Massachusetts	Dukes	1 HERRING CREEK RD, AQUINNAH (WAMPANOAG TRIBAL SITE)	0.064	0.062		0.059	0.068	0.066	0.060	2	
Massachusetts	Essex	LYNN WATER TREATMENT PLANT	0.065	0.064		0.063	0.065	0.067	0.065	1	
Massachusetts	Essex	NEWBURYPORT HARBOR ST PARKING LOT	0.064	0.064		0.064	0.065	0.065	0.065	0	
Massachusetts	Essex	CONSENTINO SCHOOL.	0.062	0.062		0.064	0.059	0.064	0.064	0	
Massachusetts	Franklin	Greenfield 16 Barr Ave	0.063	0.062		0.058	0.064	0.068	0.064	1	
Massachusetts	Hampden	WESTOVER AFB	0.070	0.068		0.065	0.070	0.076	0.071	2	
Massachusetts	Hampshire	QUABBIN RES	0.070	0.069		0.068	0.071	0.072	0.070	1	
Massachusetts	Middlesex	USEPA REGION 1 LAB	0.063	0.062		0.064	0.061	0.066	0.063	1	
Massachusetts	Norfolk	BLUE HILL OBSERVATORY	0.067	0.066		0.065	0.067	0.070	0.066	1	
Massachusetts	Plymouth	Brockton Buckley	0.064	0.063		0.060	0.065	0.067	0.064	1	
Massachusetts	Suffolk	DUDLEY SQUARE ROXBURY	0.056	0.055		0.054	0.056	0.058	0.057	1	
Massachusetts	Worcester	WORCESTER AIRPORT	0.064	0.064		0.065	0.063	0.066	0.064	0	
Massachusetts	Worcester	UXBRIDGE	0.064	0.062		0.064	0.059	0.070	0.064	2	
Michigan	Allegan	Holland		0.075	0.075	0.077	0.072	0.076	0.076	0	
Michigan	Benzie		0.069	0.069		0.069	0.067	0.072	0.072	0	
Michigan	Berrien	Coloma		0.074	0.074	0.073	0.072	0.078	0.077	0	
Michigan	Cass	Cassopolis	0.070	0.070		0.066	0.068	0.077	0.077	0	
Michigan	Chippewa	NORTH OF EASTERDAY AVENUE	0.059	0.059		0.056	0.059	0.062	0.062	0	
Michigan	Clinton	ROSE LAKE, STOLL RD.(8562 E.)	0.067	0.067		0.066	0.064	0.073	0.072	0	
Michigan	Genesee		0.068	0.068		0.068	0.066	0.072	0.072	0	
Michigan	Genesee	Otisville	0.069	0.069		0.068	0.067	0.073	0.072	0	
Michigan	Huron	RURAL THUMB AREA OZONE SITE	0.068	0.066		0.066	0.067	0.072	0.067	2	
Michigan	Ingham		0.067	0.067		0.065	0.064	0.073	0.072	0	
Michigan	Kalamazoo	KALAMAZOO FAIRGROUNDS	0.069	0.069		0.067	0.067	0.074	0.074	0	
Michigan	Kent	GR-Monroe	0.069	0.069		0.066	0.067	0.075	0.074	0	
Michigan	Kent	APPROXIMATELY 1/4 MILE SOUTH OF 14 MILE RD	0.067	0.067		0.066	0.065	0.072	0.072	0	
Michigan	Lenawee	6792 RAISIN CENTER HWY, LENAWEE CO.RD.COMM.OWNER, TECUMSEH	0.067	0.067		0.068	0.065	0.069	0.069	0	
Michigan	Macomb	New Haven		0.072	0.072	0.071	0.072	0.075	0.073	0	
Michigan	Macomb		0.067	0.067		0.068	0.064	0.071	0.070	0	
Michigan	Manistee		0.068	0.068		0.068	0.067	0.070	0.069	0	
Michigan	Mason	LOCATED 550 FT NORTH OF US10	0.070	0.069		0.070	0.066	0.074	0.073	1	
Michigan	Missaukee	LOCATED ABOUT 1/4 MILE WEST OF SITE	0.067	0.066		0.063	0.064	0.074	0.072	1	
Michigan	Muskegon			0.075	0.074	0.075	0.074	0.076	0.074	1	
Michigan	Oakland	Oak Park		0.069	0.068		0.067	0.066	0.075	0.071	1

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Michigan	Ottawa	Jenison	0.070	0.070		0.071	0.065	0.074	0.074	0
Michigan	St. Clair	Port Huron	0.073	0.070		0.071	0.075	0.073	0.066	3
Michigan	Schoolcraft	Seney	0.070	0.070		0.067	0.070	0.075	0.075	0
Michigan	Tuscola	Unionville	0.066	0.064		0.063	0.064	0.071	0.067	2
Michigan	Washtenaw	TOWNER ST, SOUTH; 2 LANE RESIDENTIAL - HOSPITAL	0.067	0.067		0.070	0.064	0.069	0.069	0
Michigan	Washtenaw	Ann Arbor	0.068	0.067		0.067	0.064	0.074	0.072	1
Michigan	Wayne	Allen Park	0.065	0.065		0.064	0.063	0.070	0.069	0
Michigan	Wayne	East 7 Mile	0.072	0.072		0.073	0.070	0.074	0.073	0
Michigan	Wayne							0.058	0.058	
Michigan	Wayne							0.070	0.068	
Michigan	Wexford	Hoxeyville	0.067	0.067		0.066	0.064	0.071	0.071	0
New Jersey	Atlantic	Brigantine	0.064	0.064	0.064	0.061	0.068	0.063	0.063	0
New Jersey	Bergen	Leonia	0.074	0.073	0.074	0.073	0.076	0.075	0.072	1
New Jersey	Camden	Camden Spruce Street	0.075	0.074	0.075	0.068	0.079	0.078	0.075	1
New Jersey	Camden	Ancora State Hospital	0.069	0.068	0.069	0.068	0.072	0.069	0.064	1
New Jersey	Cumberland	Millville	0.068	0.067	0.068	0.067	0.068	0.069	0.068	1
New Jersey	Essex	Newark - Firehouse	0.070	0.069	0.070	0.070	0.072	0.070	0.066	1
New Jersey	Gloucester	Clarksboro	0.074	0.073	0.074	0.070	0.076	0.076	0.074	1
New Jersey	Hudson	Bayonne	0.072	0.072	0.072	0.072	0.077	0.069	0.068	0
New Jersey	Hunterdon	Flemington	0.072	0.070	0.072	0.065	0.073	0.078	0.073	2
New Jersey	Mercer	Rider University	0.072	0.071	0.072	0.071	0.073	0.074	0.070	1
New Jersey	Mercer	Wash. Crossing	0.073	0.073	0.073	0.071	0.075	0.074	0.074	0
New Jersey	Middlesex	Rutgers University	0.074	0.074	0.074	0.071	0.077	0.076	0.074	0
New Jersey	Monmouth	Monmouth University	0.070	0.069	0.070	0.064	0.077	0.070	0.068	1
New Jersey	Morris	Chester	0.069	0.068	0.069	0.068	0.070	0.069	0.067	1
New Jersey	Ocean	Colliers Mills	0.073	0.072	0.073	0.072	0.075	0.072	0.071	1
New Jersey	Passaic	Ramapo	0.070	0.068	0.070	0.067	0.071	0.072	0.068	2
New Jersey	Warren	Columbia WMA	0.064	0.063	0.064	0.060	0.066	0.066	0.065	1
New York	Albany	LOUDONVILLE	0.064	0.063		0.061	0.063	0.068	0.065	1
New York	Bronx	IS 52	0.067	0.066	0.067	0.071	0.063	0.069	0.065	1
New York	Bronx	PFIZER LAB SITE	0.070	0.070	0.070	0.070	0.072	0.070	0.068	0
New York	Chautauqua	DUNKIRK	0.068	0.067		0.066	0.071	0.069	0.066	1
New York	Dutchess	MILLBROOK	0.068	0.067	0.068	0.068	0.067	0.071	0.068	1
New York	Erie	AMHERST	0.069	0.068		0.063	0.071	0.074	0.071	1
New York	Essex	WHITEFACE SUMMIT	0.062	0.061		0.059	0.060	0.067	0.065	1
New York	Essex	WHITEFACE BASE	0.065	0.063		0.060	0.067	0.068	0.064	2
New York	Essex	Huntington Wildlife Forest	0.058	0.058		0.059	0.059	0.056	0.056	0
New York	Franklin	Y001	0.058	0.057		0.054	0.071	0.049	0.047	1
New York	Hamilton	PISECO LAKE	0.060	0.059		0.058	0.062	0.061	0.059	1
New York	Herkimer	NICKS LAKE	0.063	0.058		0.057	0.061	0.071	0.057	5
New York	Jefferson	PERCH RIVER	0.063	0.062		0.059	0.065	0.067	0.062	1
New York	Monroe	ROCHESTER 2	0.063	0.063		0.058	0.065	0.067	0.066	0
New York	New York	CCNY	0.069	0.068	0.069	0.065	0.071	0.071	0.069	1
New York	Niagara	MIDDLEPORT	0.066	0.065		0.061	0.067	0.070	0.068	1
New York	Onondaga	EAST SYRACUSE	0.064	0.062		0.063	0.063	0.067	0.061	2
New York	Orange	VALLEY CENTRAL HIGH SCHOOL	0.066	0.065	0.066	0.062	0.072	0.064	0.063	1
New York	Oswego	FULTON	0.060	0.060		0.058	0.063	0.061	0.060	0
New York	Putnam	MT NINHAM	0.068	0.068	0.068	0.066	0.069	0.071	0.070	0
New York	Queens	QUEENS COLLEGE 2	0.069	0.067	0.069	0.063	0.073	0.071	0.067	2
New York	Richmond	SUSAN WAGNER HS	0.076	0.074	0.076	0.072	0.079	0.077	0.071	2

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New York	Rockland	Rockland County	0.072	0.071	0.072	0.068	0.077	0.073	0.070	1
New York	Saratoga	STILLWATER	0.063	0.062		0.061	0.061	0.067	0.065	1
New York	Steuben	PINNACLE STATE PARK	0.059	0.059		0.058	0.059	0.062	0.060	0
New York	Suffolk	BABYLON	0.072	0.070	0.072	0.066	0.078	0.073	0.067	2
New York	Suffolk	RIVERHEAD	0.072	0.070	0.072	0.064	0.076	0.078	0.072	2
New York	Suffolk	HOLTSVILLE	0.066	0.065		0.062	0.063	0.073	0.070	1
New York	Tompkins	Connecticut Hill	0.063	0.061		0.059	0.064	0.066	0.062	2
New York	Wayne	WILLIAMSON	0.064	0.063		0.064	0.061	0.067	0.064	1
New York	Westchester	WHITE PLAINS	0.074	0.072	0.074	0.074	0.073	0.075	0.070	2
Ohio	Allen	LIMA BATH	0.066	0.065		0.066	0.064	0.068	0.067	1
Ohio	Ashland	CONNEAUT	0.070	0.070	0.070	0.069	0.070	0.072	0.072	0
Ohio	Butler	HAMILTON	0.072	0.072	0.072	0.070	0.070	0.076	0.076	0
Ohio	Butler	MIDDLETOWN	0.071	0.070	0.071	0.069	0.070	0.074	0.073	1
Ohio	Butler	Oxford	0.069	0.069	0.069	0.069	0.068	0.072	0.071	0
Ohio	Clark	SPRINGFIELD WELL FIELD	0.069	0.069		0.065	0.071	0.071	0.071	0
Ohio	Clark	MUD RUN	0.067	0.066		0.064	0.069	0.070	0.067	1
Ohio	Clermont	BATAVIA	0.070	0.070	0.070	0.068	0.070	0.073	0.073	0
Ohio	Clinton	LAUREL OAKS_JVS	0.070	0.070	0.070	0.070	0.070	0.071	0.071	0
Ohio	Cuyahoga	5TH DISTRICT	0.069	0.069	0.069	0.071	0.068	0.070	0.069	0
Ohio	Cuyahoga	GT CRAIG	0.064	0.063	0.064	0.066	0.063	0.063	0.061	1
Ohio	Cuyahoga	BEREA	0.064	0.063	0.064	0.059	0.066	0.068	0.066	1
Ohio	Cuyahoga	MAYFIELD	0.068	0.067	0.068	0.061	0.072	0.071	0.070	1
Ohio	Delaware	DELAWARE	0.067	0.066	0.067	0.066	0.068	0.067	0.066	1
Ohio	Fayette	Deer Creek	0.068	0.068	0.068	0.069	0.070	0.067	0.067	0
Ohio	Franklin	NEW_ALBNY	0.071	0.071	0.071	0.070	0.071	0.072	0.072	0
Ohio	Franklin	FRANKLIN_PK	0.066	0.066	0.066	0.069	0.064	0.067	0.067	0
Ohio	Franklin	MAPLE_C	0.067	0.067	0.067	0.068	0.063	0.071	0.071	0
Ohio	Geauga	GEAUGA	0.071	0.070	0.071	0.065	0.073	0.077	0.074	1
Ohio	Greene	XENIA	0.068	0.068		0.066	0.071	0.069	0.067	0
Ohio	Hamilton	SYCAMORE	0.072	0.072	0.072	0.071	0.072	0.075	0.075	0
Ohio	Hamilton	COLERAIN	0.072	0.072	0.072	0.073	0.070	0.073	0.073	0
Ohio	Hamilton	TAFT	0.071	0.071	0.071	0.069	0.071	0.073	0.073	0
Ohio	Jefferson	STEUBEN	0.065	0.065		0.067	0.066	0.062	0.062	0
Ohio	Knox	CENTERBURG	0.067	0.067	0.067	0.066	0.071	0.066	0.065	0
Ohio	Lake	EASTLAKE	0.075	0.073	0.075	0.075	0.074	0.076	0.072	2
Ohio	Lake	JFS (PAINSVILLE)	0.067	0.067	0.067	0.062	0.070	0.069	0.069	0
Ohio	Lawrence	WILGUS	0.064	0.064		0.064	0.065	0.065	0.065	0
Ohio	Lawrence	ODOT (IRONTON)	0.067	0.066		0.062	0.069	0.070	0.069	1
Ohio	Licking	HEATH	0.067	0.067	0.067	0.066	0.068	0.067	0.067	0
Ohio	Lorain	SHEFFIELD	0.066	0.065	0.066	0.067	0.062	0.070	0.068	1
Ohio	Lucas	ERIE	0.067	0.066		0.070	0.063	0.070	0.067	1
Ohio	Lucas	WATERVILLE	0.064	0.064		0.064	0.063	0.065	0.065	0
Ohio	Lucas	LOW_SER	0.064	0.063		0.065	0.064	0.063	0.062	1
Ohio	Lucas	COOLEY CANAL						0.062	0.062	
Ohio	Madison	LONDON	0.068	0.068	0.068	0.069	0.069	0.068	0.068	0
Ohio	Mahoning		0.063	0.063		0.066	0.069	0.054	0.054	0
Ohio	Medina	CHIPPEWA	0.064	0.064	0.064	0.064	0.063	0.066	0.066	0
Ohio	Miami	MIAMI EAST	0.067	0.067		0.066	0.068	0.069	0.069	0
Ohio	Montgomery	EASTWOOD	0.070	0.070		0.069	0.070	0.072	0.071	0
Ohio	Noble	Quaker City	0.066	0.066		0.065	0.066	0.068	0.068	0

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Ohio	Portage	ROCKWELL	0.061	0.061	0.061	0.064	0.064	0.059	0.058	0
Ohio	Preble	NATIONAL TRAIL SCHOOL	0.067	0.067	0.065	0.067	0.069	0.069	0.069	0
Ohio	Stark	MALONE_COL	0.069	0.069	0.069	0.065	0.072	0.072	0.070	0
Ohio	Stark	BREWSTER (WANDLE)	0.064	0.064	0.064	0.059	0.068	0.067	0.067	0
Ohio	Stark	ALLIANCE	0.066	0.065	0.066	0.061	0.067	0.071	0.069	1
Ohio	Summit	PATTERSON PARK (PATT_PARK)	0.061	0.061	0.061	0.058	0.065	0.061	0.061	0
Ohio	Trumbull	TCSEG	0.068	0.068		0.065	0.070	0.071	0.070	0
Ohio	Trumbull	KINSMAN				0.066	0.070	0.069		
Ohio	Warren	LEBANON		0.072	0.072	0.072	0.071	0.074	0.074	0
Ohio	Washington	MARIETTA_TWP.	0.065	0.065		0.063	0.068	0.064	0.064	0
Ohio	Wood	BOWLING GREEN	0.063	0.063		0.063	0.062	0.066	0.066	0
Pennsylvania	Adams	NARSTO SITE ARENDTSVILLE	0.058	0.057		0.037	0.065	0.073	0.069	1
Pennsylvania	Adams	Arendtsville	0.067	0.066	0.067	0.063	0.067	0.071	0.069	1
Pennsylvania	Allegheny	Lawrenceville	0.067	0.067		0.065	0.071	0.067	0.067	0
Pennsylvania	Allegheny	South Fayette	0.068	0.068		0.065	0.068	0.072	0.072	0
Pennsylvania	Allegheny	Harrison	0.070	0.070		0.071	0.074	0.067	0.066	0
Pennsylvania	Armstrong	LAT/LON IS CENTER OF TRAILER	0.070	0.068		0.068	0.070	0.073	0.068	2
Pennsylvania	Beaver		0.070	0.069		0.069	0.070	0.071	0.069	1
Pennsylvania	Beaver	DRIVEWAY TO BAEKY RESIDENCE	0.068	0.068		0.070	0.067	0.068	0.068	0
Pennsylvania	Beaver		0.065	0.065		0.066	0.063	0.068	0.066	0
Pennsylvania	Berks	Kutztown	0.066	0.064	0.066	0.063	0.066	0.070	0.064	2
Pennsylvania	Berks	Reading Airport		0.071	0.069	0.071	0.068	0.075	0.068	2
Pennsylvania	Blair		0.063	0.063		0.060	0.069	0.062	0.062	0
Pennsylvania	Bradford	Towanda	0.056	0.055		0.051	0.058	0.060	0.057	1
Pennsylvania	Bucks	A420170012LAT/LONG POINT IS OF SAMPLING INLET		0.077	0.075	0.077	0.071	0.080	0.074	2
Pennsylvania	Cambria		0.063	0.062		0.060	0.065	0.064	0.062	1
Pennsylvania	Centre	LAT/LON=POINT SW CORNER OF TRAILER	0.063	0.063		0.063	0.064	0.063	0.063	0
Pennsylvania	Centre	Penn State	0.065	0.065		0.064	0.068	0.065	0.064	0
Pennsylvania	Chester	CHESTER COUNTY TRANSPORT SITE INTO PHILADELPHIA		0.073	0.070	0.073	0.071	0.068	0.080	0.072
Pennsylvania	Clearfield	MOSHANNON STATE FOREST	0.064	0.064		0.060	0.068	0.066	0.066	0
Pennsylvania	Dauphin	A420430401LAT/LON POINT IS AT CORNER OF TRAILER	0.066	0.064	0.066	0.063	0.068	0.068	0.062	2
Pennsylvania	Dauphin	A420431100LAT/LON POINT IS AT CORNER OF TRAILER	0.067	0.065	0.067	0.063	0.068	0.070	0.065	2
Pennsylvania	Delaware	A420450002LAT/LON POINT IS OF CORNER OF TRAILER		0.072	0.072	0.072	0.073	0.074	0.071	0.070
Pennsylvania	Elk	Kane Exp. Forest	0.066	0.064		0.064	0.067	0.067	0.063	2
Pennsylvania	Erie		0.066	0.065		0.065	0.066	0.067	0.065	1
Pennsylvania	Franklin	HIGH ELEVATION OZONE SITE	0.060	0.060	0.060	0.063	0.059	0.059	0.058	0
Pennsylvania	Greene	75 KM SSW OF PITTSBURGH RURAL SITE ON A KNOLL WITHIN A LARGE CLEARIN	0.067	0.067		0.065	0.071	0.067	0.067	0
Pennsylvania	Indiana		0.070	0.069		0.068	0.073	0.071	0.066	1
Pennsylvania	Lackawanna	A420690101LAT/LON POINT IS AT CORNER OF TRAILER	0.067	0.066		0.061	0.069	0.071	0.068	1
Pennsylvania	Lackawanna	A420692006LAT/LON POINT IS AT CORNER OF TRAILER	0.064	0.064		0.060	0.068	0.066	0.065	0
Pennsylvania	Lancaster	A420710007LAT/LON POINT AT CORNER OF TRAILER	0.069	0.067	0.069	0.066	0.071	0.071	0.064	2
Pennsylvania	Lancaster	Lancaster DW	0.066	0.064	0.066	0.063	0.070	0.067	0.061	2
Pennsylvania	Lawrence		0.068	0.067		0.068	0.069	0.068	0.066	1
Pennsylvania	Lebanon	Lebanon		0.071	0.069	0.071	0.067	0.074	0.072	0.067
Pennsylvania	Lehigh	A420770004LAT/LONG POINT IS OF SAMPLING INLET	0.070	0.068	0.070	0.068	0.070	0.073	0.067	2
Pennsylvania	Luzerne	A420791101LAT/LON POINT IS AT CORNER OF TRAILER	0.064	0.064		0.060	0.067	0.066	0.065	0
Pennsylvania	Lycoming	MONTOURSVILLE	0.064	0.063		0.062	0.065	0.065	0.063	1
Pennsylvania	Mercer		0.069	0.068		0.071	0.066	0.070	0.069	1
Pennsylvania	Mercer	M.K. Goddard	0.065	0.064		0.060	0.068	0.069	0.065	1
Pennsylvania	Monroe	SWIFTWATER	0.065	0.065	0.065	0.060	0.067	0.070	0.068	0

Monitor Status

State Name	County Name	Local Site Name	2014-2016 Design Value (ppm)	No Fire 2014-2016 Design Value (ppm)	EPA Accepted 2014-2106 Design Value (ppm)	2014 4th Highest Daily Max Value	2015 4th Highest Daily Max Value	2016 4th Highest Daily Max Value	2016 4th Highest Daily Max Value (No Fire Dates)	2014-2016 DV Delta (ppb)
						2014 4th Highest Daily Max Value	2015 4th Highest Daily Max Value			
Pennsylvania	Montgomery	A420910013LAT/LON POINT IS OF CORNER OF TRAILER	0.072	0.070	0.072	0.072	0.073	0.073	0.066	2
Pennsylvania	Northampton	LAT/LON POINT IS CENTER OF TRAILER	0.070	0.068	0.070	0.067	0.070	0.075	0.069	2
Pennsylvania	Northampton	COMBINED EASTON SITE (420950100) AND EASTON H2S SPECIAL STUDY SITES	0.069	0.066	0.069	0.066	0.067	0.074	0.065	3
Pennsylvania	Philadelphia	Air Management Services Laboratory (AMS LAB)	0.061	0.059	0.061	0.058	0.057	0.069	0.064	2
Pennsylvania	Philadelphia	North East Airport (NEA)	0.077	0.075	0.077	0.072	0.079	0.080	0.074	2
Pennsylvania	Philadelphia	North East Waste (NEW)	0.074	0.072	0.074	0.068	0.078	0.076	0.071	2
Pennsylvania	Somerset	Laurel Hill	0.062	0.062		0.062	0.058	0.067	0.067	0
Pennsylvania	Tioga	PENN STATE OZONE MONITORING SITE	0.063	0.061		0.058	0.065	0.068	0.062	2
Pennsylvania	Washington		0.068	0.068		0.065	0.072	0.069	0.069	0
Pennsylvania	Washington		0.065	0.065		0.064	0.069	0.064	0.064	0
Pennsylvania	Washington		0.068	0.067		0.064	0.071	0.070	0.068	1
Pennsylvania	Westmoreland	LAT/LON POINT IS TRAILER	0.068	0.068		0.064	0.069	0.072	0.072	0
Pennsylvania	York	A421330008LAT/LON POINT AT CORNER OF TRAILER	0.066	0.066	0.066	0.063	0.068	0.069	0.067	0
Pennsylvania	York	York DW	0.070	0.067		0.063	0.074	0.073	0.066	3
Wisconsin	Ashland	BAD RIVER TRIBAL SCHOOL - ODANAH	0.058	0.058		0.056	0.057	0.062	0.062	0
Wisconsin	Brown	GREEN BAY - UW	0.066	0.066		0.066	0.065	0.068	0.068	0
Wisconsin	Columbia	COLUMBUS	0.067	0.067		0.069	0.064	0.070	0.070	0
Wisconsin	Dane	MADISON EAST	0.065	0.065		0.066	0.064	0.066	0.066	0
Wisconsin	Dodge	HORICON WILDLIFE AREA	0.068	0.068	0.068	0.071	0.066	0.068	0.068	0
Wisconsin	Door	NEWPORT PARK	0.072	0.072	0.072	0.065	0.074	0.077	0.077	0
Wisconsin	Eau Claire	EAU CLAIRE - DOT SIGN SHOP	0.061	0.061		0.061	0.059	0.064	0.064	0
Wisconsin	Fond du Lac	FOND DU LAC	0.066	0.066		0.067	0.065	0.066	0.066	0
Wisconsin	Forest	POTAWATOMI	0.063	0.063		0.061	0.063	0.065	0.065	0
Wisconsin	Jefferson	JEFFERSON - LAATSCH	0.069	0.069	0.069	0.071	0.065	0.071	0.071	0
Wisconsin	Kenosha	CHIWAUKEE PRAIRIE STATELINE	0.077	0.077		0.076	0.075	0.080	0.080	0
Wisconsin	Kenosha	KENOSHA - WATER TOWER	0.071	0.071		0.070	0.068	0.076	0.076	0
Wisconsin	Kewaunee	KEWAUNEE	0.069	0.069		0.065	0.070	0.072	0.072	0
Wisconsin	La Crosse	LACROSSE - DOT BUILDING	0.062	0.062		0.063	0.061	0.063	0.063	0
Wisconsin	Manitowoc	MANITOWOC - WDLND DUNES	0.072	0.072	0.072	0.066	0.077	0.074	0.073	0
Wisconsin	Marathon	LAKE DUBAY	0.065	0.065		0.064	0.063	0.068	0.068	0
Wisconsin	Milwaukee	MILWAUKEE - SIXTEENTH ST. HEALTH CENTER	0.064	0.064	0.064	0.062	0.063	0.068	0.068	0
Wisconsin	Milwaukee	MILWAUKEE - SER DNR HDQRS	0.068	0.068	0.068	0.068	0.066	0.070	0.070	0
Wisconsin	Milwaukee	BAYSIDE	0.071	0.071	0.071	0.069	0.068	0.077	0.077	0
Wisconsin	Outagamie	APPLETON - AAL	0.067	0.067		0.070	0.066	0.066	0.066	0
Wisconsin	Ozaukee	GRAFTON	0.071	0.071	0.071	0.074	0.070	0.071	0.071	0
Wisconsin	Ozaukee	HARRINGTON BEACH PARK	0.073	0.073	0.073	0.070	0.071	0.079	0.079	0
Wisconsin	Racine	RACINE - PAYNE AND DOLAN					0.068	0.076	0.075	
Wisconsin	Rock	BELOIT - CONVERSE	0.069	0.069		0.072	0.064	0.072	0.072	0
Wisconsin	Sauk	DEVILS LAKE PARK	0.064	0.064		0.064	0.063	0.066	0.066	0
Wisconsin	Sheboygan	SHEBOYGAN - KOHLER ANDRAE	0.079	0.078	0.079	0.072	0.081	0.085	0.083	1
Wisconsin	Sheboygan	SHEBOYGAN - HAVEN	0.069	0.069	0.069	0.068	0.067	0.074	0.074	0
Wisconsin	Taylor	Perkinstown	0.061	0.061		0.062	0.057	0.064	0.064	0
Wisconsin	Vilas	TROUT LAKE	0.061	0.061		0.061	0.060	0.063	0.063	0
Wisconsin	Walworth	LAKE GENEVA	0.070	0.070	0.070	0.073	0.067	0.072	0.072	0
Wisconsin	Waukesha	WAUKESHA - CLEVELAND AVE	0.066	0.066	0.066	0.067	0.066	0.067	0.067	0