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Subject: Information quality complaint: Docket Number OAR-2003-0083

Greetings,

This is a request for the prompt correction of significant and obvious errors in an EPA document.

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1. Description of the information that does not comply with the Office of Management and Budget and EPA Information Quality Guidelines, including specific citations to the information and to the guidelines.

The following EPA document includes incorrect information about Guadalupe County, Texas:

Responses to Comments on EPA's Designation and Classification of Areas for the 8-Hour Ozone National Ambient Air Quality Standard
Docket Number OAR-2003-0083
U.S. Environmental Protection Agency
April 15, 2004
Pages 173 and 199-200.

Incorrect information:

"Guadalupe County is located east-southeast of Bexar County....This county is upwind of the core metroplex during the ozone season and, therefore, emissions in this county tend to carry into the San Antonio area more frequently... The meteorological information, the increased percent contribution in NOx and VOC emissions, the high projected growth, the proximity to the core metropolitan areas and the urbanization of western Guadalupe County are notable."

2. Explanation of how the information does not comply with the Information Quality Guidelines.

The following statements are factually incorrect:

"Guadalupe County is located east-southeast of Bexar County."

Incorrect. The center of Guadalupe County is east-northeast, not east-southeast, of the center of Bexar County. The population centers in Guadalupe County are virtually due east of the two ozone monitors in Bexar County that have measured the highest ozone concentrations in that county (CAMS 23 and 58).

"This county is upwind of the core metroplex during the ozone season and, therefore, emissions in this county tend to carry into the San Antonio area more frequently."

Incorrect. The prevailing wind during the May-October ozone season is from the southeast. Thus, Guadalupe County is not "upwind of the core metroplex during the ozone season." According to the wind data provided to the Texas Commission on Environmental Quality (TCEQ), Guadalupe County is upwind of "the core metroplex" during only 1.8 days (October) to 2.8 days (May) per ozone season month.

Moreover, the two population centers in Guadalupe County (Seguin and Schertz) are upwind from the ozone monitors at CAMS 23 and CAMS 58 fewer than 1.5 days per ozone season month.

The EPA's incorrect statements are used to justify the last sentence above, rendering that statement also incorrect.

DISCUSSION:

The EPA assertions about the geographical location of Guadalupe County above contradict maps of the State of Texas published by the USGS, the State of Texas, text books, almanacs and so forth.

The EPA assertions above directly contradict EPA wind data and software previously provided by the EPA to the Texas Commission on Environmental Quality (TCEQ). See www.tnrc.state.tx.us/air/monops/windroses/windroses.html

The principal population centers in Guadalupe County, Seguin and Schertz, are nearly due east of the center point of an imaginary line connecting the ozone monitors in San Antonio that indicate that city's highest ozone concentrations (CAMS 23 and CAMS 58). Seguin and Schertz are ENE of the "core metroplex." For example, the intersection of IH-10 and HW 123 Bypass at Seguin is 29.6 degrees N and Schertz is at 29.5 degrees N. CAMS 58 is 29.6 degrees N. CAMS 23 is 29.5 degrees N. (See USGS topographic maps for the Western United States, 14-8, San Antonio, and 14-9, Seguin.) The Alamo Tree on the San Antonio River in downtown San Antonio, is 29.4 degrees N.

According to the EPA-provided wind roses on the Texas Commission on Environmental Quality (TCEQ) web site, the prevailing wind during the May-October ozone season is from the southeast. Thus, Guadalupe County is rarely "upwind of the core metroplex during the ozone season." The wind roses show that air from Seguin and Schertz flows toward San Antonio fewer than 1.5 days per month. According to the data provided by the EPA to TCEQ, The percentage of time per month that wind flows from the East toward San Antonio during the ozone season are:

May 5.5%
Jun 4.5%
Jul 4.0%
Aug 4.0%
Sep 5.0%
Oct 4.5%

Furthermore, the prevailing winds during the ozone season, as indicated by the wind roses provided by the EPA to TCEQ, are quite different from the EPA's incorrect assertion given above:

May SE/SSE
Jun SE
Jul SE
Aug SE
Sep SE
Oct SE

3. Recommendation for corrective action.

Promptly remove the erroneous statements and replace them with scientifically correct statements.

4. Explanation of how the alleged error affects or how a correction would benefit the sender.

A. I have measured air quality in Guadalupe County, Texas, regularly since 1989. Many of my findings have been or will be published in the peer-reviewed literature (see papers listed at www.forrestmims.org).

The data I publish are validated by the scientific community. The EPA, without scientific review, has used tax dollars to circulate incorrect, negative statements about the geographical location and the air quality of Guadalupe County, Texas.

B. Guadalupe County, Texas, is in full compliance with the Clean Air Act's ozone mandate. TCEQ has concluded that the contribution of air pollution from Guadalupe County to Bexar County is "insignificant." Nevertheless, relying on the erroneous assertions given above, the EPA has classified Guadalupe County in nonattainment of the Clean Air Act's ozone mandate. This paints a very negative image of this clean, rural county, which receives significant air pollution from San Antonio on days when the wind is from the West.

C. EPA's reputation within the US and international scientific community is diminished by the erroneous statements given above. No models or ozone data are provided to find Guadalupe County in nonattainment. Instead, the EPA mislocates the county from its actual position and then proceeds to base its assertions on this erroneous assumption. This unprofessional approach to air quality science denigrates in the eyes of the public those of us who attempt to do high quality monitoring of the atmospheric environment. It also gives cause for citizens to ridicule the government that they are required to support with their taxes.

Sincerely,

Forrest M. Mims III
www.forrestmims.org