Nashville-Davidson County Air Monitoring Network Plan 2025

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1.0 NASHVILLE AIR MONITORING NETWORK OVERVIEW

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

This document provides information on Nashville's current 2025 Ambient Air Monitoring Network. With that, it details any proposed changes to the network, monitoring site descriptions, and monitoring site evaluations. This document is intended to fulfill the requirements of 40 CFR Part 58.10, in which a monitoring organization must review their network on an annual basis to ensure that all requirements (within 40 CFR, Part 58, Appendices A, B, C, D, and E) are being met.

1.1 CURRENT 2025 MONITORING NETWORK

The 2025 Nashville-Davidson County Ambient Air Monitoring Network has had no significant changes compared to 2024. Nashville's 2025 air monitoring network meets all minimum monitoring requirements laid out in *40CFR* for all parameter pollutants (PM_{2.5}, O₃, SO₂, NO₂, and CO) except PM₁₀. In response to its 2016 Annual Network Plan and again in 2020, Nashville gained EPA approval for waiver of a *40CFR* requirement (*Part 58, Appendix D, Section 4.6*), which outlines the need for two (2) PM₁₀ monitors to be operated within the Nashville-Davidson-Murfreesboro-Franklin CBSA. This waiver allows Nashville to have only one (1) PM₁₀ monitor in operation within its monitoring network and was approved due to the historically low PM₁₀ concentrations recorded in Davidson County. The Nashville-Davidson County Air Monitoring Program (AMP) is requesting a waiver extension, which will be discussed in further detail later in *Section 2.2 "PM₁₀ Monitoring"*.

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

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

The map shown in *Figure 1-1* below depicts the location of each ambient air monitoring site within Nashville's 2025 monitoring network.



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

Nashville has four (4) monitoring sites in operation for 2025, which are listed below along with the criteria pollutants monitored at each site.

- 1) The <u>East Health Center ("East")</u> site monitors for ozone (O₃) and nitrogen dioxide (NO₂) (with supporting parameters Nitrous Oxide (NO) and Nitrogen Oxides (NO_x));
- 2) The <u>Lockeland Elementary School ("LL")</u> site monitors for continuous PM₁₀, continuous PM_{2.5} (*Regulatory and AQI specific*), and intermittent filter-based PM_{2.5};
- 3) The PERCY PRIEST DAM ("PPD") site monitors for O₃; and
- 4) The NEAR ROAD SITE ("NRS") monitors for PM_{2.5}, carbon monoxide (CO), NO₂ (with NO/NO_x), and sulfur dioxide (SO₂) (with supporting parameter SO₂MAX).

2.0 PROPOSED CHANGES TO MONITORING NETWORK

No major changes are proposed to take place in 2025 for the Nashville-Davidson County Monitoring Network.

2.1 OZONE (O₃) MONITORING

No changes are proposed for this portion of the Nashville Davidson County Air Monitoring Network in 2025. Although, discussions have taken place with the EPA with regards to moving the ozone monitor, currently located at the "PPD" monitoring site, to a new location for future monitoring. This new site has not yet been confirmed but likely will be in the Southeast quadrant of Davidson County, located to ensure the capture of pollutants downwind of the secondary wind direction. Some things must be kept in mind during this location scouting such as ideally positioning the new site 5-10 miles downwind from NO_x production areas (downtown highway loop). The new location should be relevant to current population dynamics and ensure that afternoon wind directions during O_3 season are considered.

2.2 PM₁₀ MONITORING

In 2016, some significant changes were proposed to the Nashville PM_{10} monitoring network including the closing of two sites, Hillwood and Trevecca, and the relocation of one PM_{10} monitor to the

Lockeland Elementary site. As part of those changes, a waiver was issued to Nashville to allow the area to run just one PM₁₀ monitor instead of the two that are required for the CBSA per *40 CFR Part 58, Appendix D, Section 4.6.* Approval for this waiver to be extended was received as a result of the AMP's 2020 Annual Network Plan.

Nashville-Davidson County AMP is requesting the continuation of this waiver again in 2025. At the time that the current waiver was granted PM₁₀ levels were approximately 13% of the NAAQS 150 μ g/m³ (2016 Nashville-Davidson County Annual Network Plan). Since the waiver was approved, PM₁₀ levels in the area have stayed significantly below the 150 μ g/m³ threshold with a 2024 annual mean of 16.3 μ g/m³. *Figures 2-1 and 2-2* below illustrate the PM₁₀ trends at Lockeland Elementary since the waiver was first approved, showing the 2nd highest 24-hour max for the PM₁₀ monitor as well as the annual mean concentrations. As can be seen in these graphs, PM₁₀ levels have remained significantly below the 150 μ g/m³ threshold. At this time, Nashville-Davidson County Air Monitoring Program does not believe that the reintroduction of second PM₁₀ monitor to our network is necessary given such low numbers.

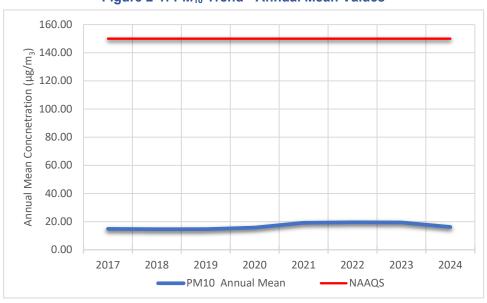
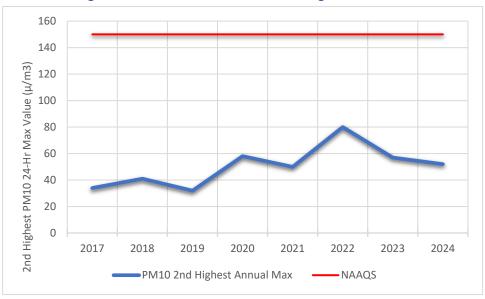


Figure 2-1: PM₁₀ Trend - Annual Mean Values





2.3 PM_{2.5} MONITORING

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

2.4 NITROGEN DIOXIDE (NO₂) MONITORING

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

2.5 CARBON MONOXIDE (CO) MONITORING

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

2.6 SULFUR DIOXIDE (SO₂) MONITORING

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

3.0 NASHVILLE SITE DESCRIPTIONS

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

The East Health Center Monitoring Site has been in operation since 1972. Since its start, this site has been used to monitor O_3 and NO_2 (and NO/NO_X) and will continue to do so in 2025.

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

Figure 3-1: East Health Center



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



Table 3-1: East Health Center Site Information

Agency Name (Code) Metro Public Health Department (0682)						
AQS ID	470370011					
County Name	Davidson					
Address	1015 Trinity Lane					
CBSA	34980					
Latitude, Longitude	36.205000,	-86.744722				
Parameter Code	42602	44201				
Parameter Name	NO ₂	O ₃				
Monitor Type	SLAMS	SLAMS				
POC	1	1				
Collection Frequency	Hourly	Hourly				
Method	074	047				
Monitoring Instrument	Thermo 42i	Thermo 49i				
Analysis	Chemiluminescence	Photometric				
Ref. Method ID	RFNA-1289-074	EQOA-0880-047				
Monitor Objective	Highest Concentration	Population Exposure				
Dominant Source	Area	Area				
Measurement Scale	Neighborhood	Neighborhood				
Land Use Type	Residential	Residential				
Location Setting	Urban	Urban				
Date Established	1/6/1975	1/1/1972				

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

The Percy Priest Dam monitoring site was established in 1978. It is located on the Army Corps of Engineers Percy Priest Dam campus. This site is used to monitor solely for O₃ which will continue in 2025.



Figure 3-3: Percy Priest Dam Site





Table 3-2: Percy Priest Dam Site Information

Agency Name (Code)	Metro Public Health Department (0682)
AQS ID	470370026
County Name	Davidson
Address	3711 Bell Road
CBSA	34980
Latitude, Longitude	36.150742, -86.623301
Parameter Code	44201
Parameter Name	O ₃
Monitor Type	SLAMS
POC	1
Collection Frequency	Hourly
Method	087
Monitoring Instrument	Teledyne T400
Analysis	Photometric
Ref. Method ID	EQOA-0992-087
Monitor Objective	Highest Concentration
Dominant Source	Area
Measurement Scale	Urban
Land Use Type	Agricultural
Location Setting	Urban
Date Established	28491

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

The "LL" monitoring site began operation in 1999 and monitors for PM_{2.5} and PM₁₀. This will continue in 2025. At the end of 2014, this site was defunded as a CSN site and the SASS and URG monitors were shut down. At the end of 2016, the Hi-Vol PM₁₀ monitors at Trevecca and McCann were approved to be shut down and in January 2017 a PM₁₀ TEOM monitor began operation at this location. Starting July 1st, 2019, an FEM (POC 3) MetOne BAM1022 PM_{2.5} monitor was added to the "LL" site to replace the Thermo 2025i FRM (POC 1) monitor. This decision to replace the FRM with an FEM was justified in the 2019 Annual Network Plan and approved by EPA. In the beginning on 2020, a Tornado caused damage to the "LL" site and the equipment stationed there, causing this site to be shut down for repair. All equipment had to be replaced and monitoring began again in August/September 2020. As a result of this incident, several changes were made to the type of PM monitors that were previously at the site. The two (2) Thermo TEOM 1405 monitors (*which captured data for PM_{2.5} (AQI) and PM₁₀*) were replaced with a single piece of equipment, the Teledyne T640x which measures both criteria pollutants (PM_{2.5} & PM₁₀). As discussed previously, the T640x PM_{2.5} monitor at "LL" is used solely for AQI reporting.

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

Figure 3-6: Lockeland Site



Figure 3-5: Lockeland Aerial View

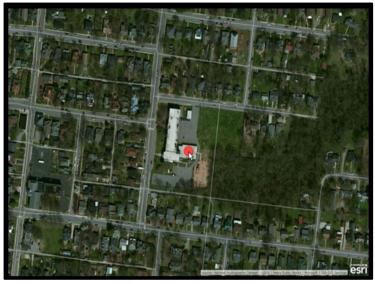


Table 3-3: Lockeland Site Information

Agency Name (Code)	Metro Public Health Department (0682)									
AQS ID	470370023									
County Name	Davidson									
Address	105 South 17th Street									
CBSA		349	80							
Latitude, Longitude		36.176326, -	·86.738902							
Parameter Code	88101	88101	88101	81102						
Parameter Name	PM _{2.5}	PM _{2.5}	PM _{2.5}	PM ₁₀						
Monitor Type	SLAMS	SLAMS	SPM SLAMS (AQI only - NAAQS Exclusion)							
POC	2	3	4	2						
Collection Frequency	1:6	Hourly	Hourly	Hourly						
Method	145	638	639							
Monitoring Instrument	Thermo 2025i	MetOne BAM1022	Teledyne T640x	Teledyne T640x						
Analysis	Gravimetric	Beta Attenuation	Light Scattering	Light Scattering						
Ref. Method ID	EQPM-0202-145	EQPM-1013-209	EQPM-0516-238	EQPM-0516-239						
Monitor Objective	Population Exposure	Population Exposure	Population Exposure	Population Exposure						
Dominant Source	Area	Area	Area	Area						
Measurement Scale	Neighborhood	Neighborhood	Neighborhood	Neighborhood						
Land Use Type	Residential Residential Resident									
Location Setting	Urban Urban Urban U									
Date Established	1/1/1999	1/1/1999	3/1/2001	1/1/2017						

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

As a result of the 40CFR near road NO₂ monitoring requirement, Nashville's Near Road monitoring site was established in July 2014, along the I-24/I-40 split in downtown Nashville. CO, NO₂, and PM_{2.5} monitors have been in operation at this site since its start. Although initially using a PM_{2.5} FRM monitor (Thermo 2025i) at this site, in July 2019, Nashville replaced it with an FEM PM_{2.5} monitor (MetOne BAM1022). In January 2020, SO₂ monitoring began at this site after being moved from the "EAST" site. Nashville will continue to monitor for PM_{2.5}, CO, SO₂ (& SO₂MAX), and NO₂ (& NO/NO_X) at "NRS" in 2025.



Figure 3-7: Near Road Site

Figure 3-8: Near Road Site (Aerial View)

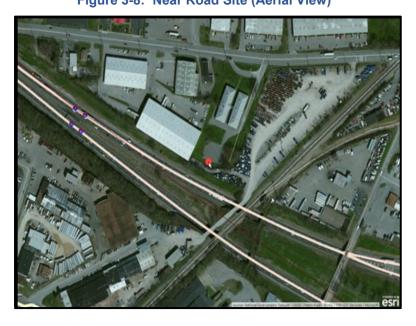


Table 3-4: Near Road Site Information

Agency Name	Metro Public Health Department (0682)								
AQS ID	470370040								
County Name	Davidson								
Address	1113 Elm Hill Pike								
CBSA		3498	30						
Latitude, Longitude		36.142377, -	86.734142						
Parameter Code	42101	42602	42401	88101					
Parameter Name	СО	NO ₂	SO ₂	PM _{2.5}					
Monitor Type	SLAMS	SLAMS	SLAMS	SLAMS					
POC	1	3							
Collection Frequency	Hourly	Hourly	Hourly	Hourly					
Method	093 074 060 209								
Monitoring Instrument	Teledyne T300	Thermo 42iQ	Thermo 43iQ	MetOne BAM1022					
Analysis	Infrared	Chemiluminescence	Pulsed Fluorescence	Beta Attenuation					
Ref. Method ID	RFCA-1093-93	RFCA-1289-74	EQSA-0486-060	EQPM-1013-209					
Monitor Objective	Population Exposure	Population Exposure	Population Exposure	Population Exposure					
Dominant Source	Area	Area	Area	Area					
Measurement Scale	Urban	Urban	Urban	Urban					
Land Use Type	Industrial								
Location Setting	g Urban Urban Urban U								
Date Established	Date Established 7/1/2014								

4.0 **CURRENT SITE ASSESSMENTS**

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

Each of Nashville's monitoring sites have been assessed in the last calendar year, and meet requirements laid out in 40 CFR Part 58, Appendix E. The results of these site assessments can be found below in: Table 4-1 "2025 Site Assessment Results Summary", the filled-out Site Evaluation Forms [PCD-AM-020] for each site, as well as pictures showing 360° around the site monitor inlet. Additionally, included in Appendix A of this document, is the Site Evaluation Form [PCD-AM-020] that Nashville's Field Technicians will use to conduct these site evaluations.

Table 4-1: 2025 Site Assessment Results Summary

Table 4-1: 2025 Site Assessment Results Summary										
East Health Center Assessment Date: 4/15/25										
Site Pollutant	Probe Inlet Height (IH)	Obstruct. Height (OH)	Dripline	Obstruct. Distance (OD)	Obstruct. Type	Unrestricted Airflow	Findings			
O ₃	10.0 m	16.5 m	16.9 m	19.3 m	Trees	300°	Site OK; trees to the north			
NO ₂	10.0 m	16.5 m	16.9 m	19.3 m	Trees	300°	and east will be monitored.			
		Per	cy Priest D	am			Assessment Date: 4/23/25			
Site Pollutant	Probe Inlet Height (IH)	Obstruct. Height (OH)	Dripline	Obstruct. Distance (OD)	Obstruct. Type	Unrestricted Airflow	Findings			
О3	5.3 m	17.0 m	39.0 m	45.0 m	Trees	310°	Site OK; trees to the north will be monitored.			
		Lockel	and Eleme	ntary			Assessment Date: 4/24/25			
Site Pollutant	Probe Inlet Height (IH)	Obstruct. Height (OH)	Dripline	Obstruct. Distance (OD)	Obstruct. Type	Unrestricted Airflow	Findings			
PM _{2.5} (Primary FEM - Collocated)	5.8 m	6.1 m	30.0 m	19.0 m	Building	280°				
PM _{2.5} (FRM - Collocated)	5.8 m	6.1 m	30.0 m	20.5 m	Building	280°	Site OK; all large trees lost at site due to 2020 tornado/2021 storms.			
PM _{2.5} (SPM - AQI) PM ₁₀	5.8 m	6.1 m	30.0 m	18.5 m	Building	280°	Collocated Distance: 3.0 m			
		Ne	ar Road Si	te			Assessment Date: 4/15/25			
Site Pollutant	Probe Inlet Height (IH)	Obstruct. Height (OH)	Dripline	Obstruct. Distance (OD)	Obstruct. Type	Unrestricted Airflow	Findings			
SO ₂	4.5 m	14.2 m	20.0 m	23.0 m	Trees	295°	Site OK; vegetation on			
СО	4.5 m	14.2 m	20.0 m	23.0 m	Trees	295°	fence line and trees to the east will be monitored.			
NO ₂	4.5 m	14.2 m	20.0 m	23.0 m	Trees	295°	Distance to nearest road:			
PM _{2.5}	4.5 m	14.2 m	20.0 m	23.0 m	Trees	295°	28.9 m			

4.1 ("EAST") EAST HEALTH CENTER 2025 SITE ASSESSMENT

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

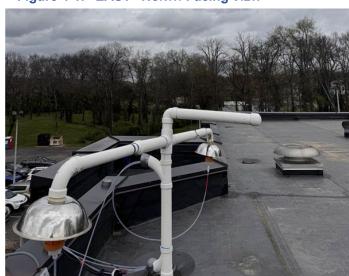


Figure 4-2: "EAST" East-Facing View



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

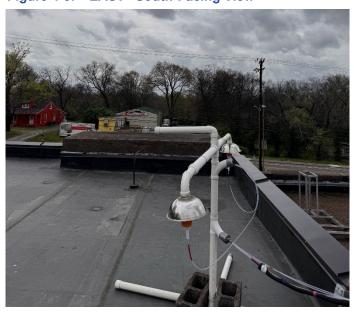


Figure 4-4: "EAST" West-Facing View

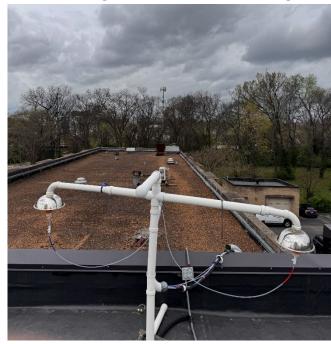
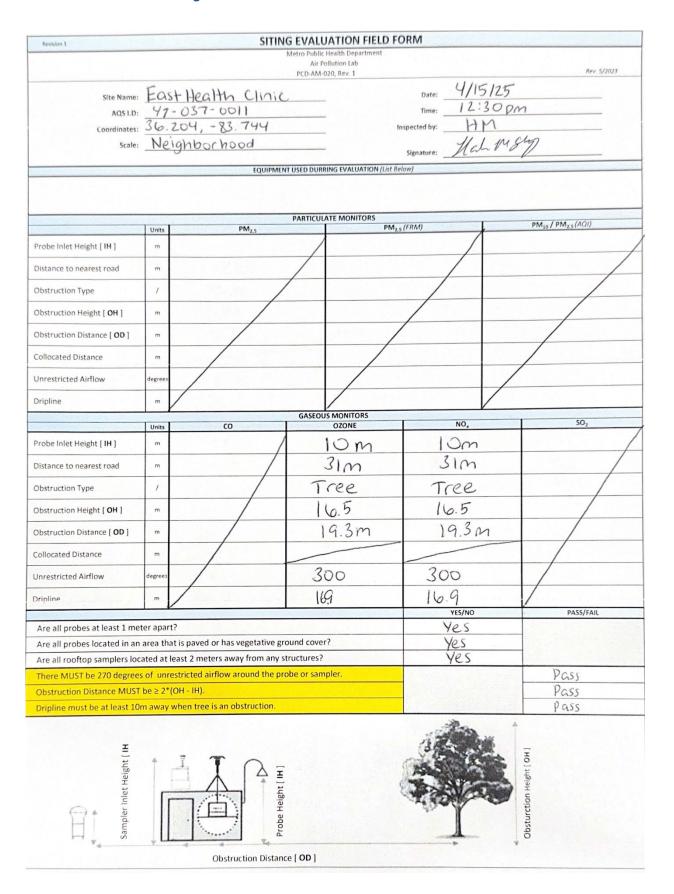


Figure 4-5: "EAST" 2025 Site Assessment Form



4.2 ("PPD") PERCY PRIEST DAM 2025 SITE ASSESSMENT

Figure 4-6: "PPD" North-Facing View



Figure 4-9: "PPD" East-Facing View



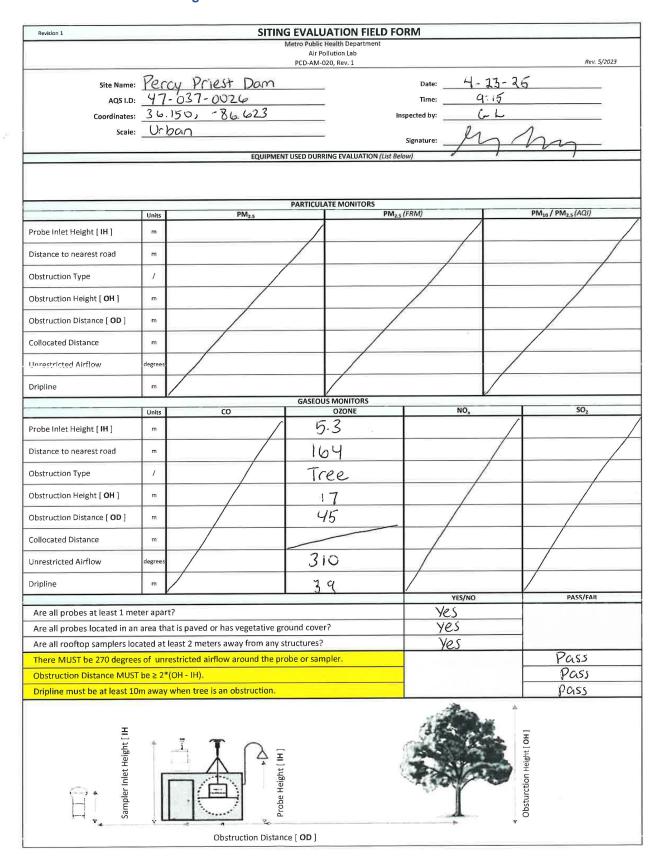
Figure 4-8: "PPD" SOUTH-FACING View



Figure 4-7: "PPD" West-Facing View



Figure 4-10: "PPD" 2025 Site Assessment Form



4.3 LOCKELAND ELEMENTARY ("LL") 2025 SITE ASSESSMENT

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



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



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



Figure 4-14: "LL" WEST-FACING VIEW



Figure 4-15: "LL" 2025 Site Assessment Form

Revision 1		SITING	G EVALL	JATION FIELD FO	RM				
			Metro Public	Health Department	13171				
				020, Rev. 1			Rev. 5/2023		
Site Name:	Lo	ckeland			Date: 4 -	24.25			
AQS I.D:	AQSI.D: 47-0037-0023 Coordinates: 36.176, -86.738 In Scale: Neighborhood								
Coordinates:	36.	176, -86.738	spected by:	7					
Scale:	Ne	ighbor hood			Signature:	7	711		
EQUIPMENT USED DURRING EVALUATION (List Below)									
							Ĺ		
	Units	PM _{2.5}	PARTICUL	ATE MONITORS PM2.5	(FRM)		PM ₁₀ / PM _{2.5} (AQI)		
Probe Inlet Height [IH]	m	5.8		5.8			5.8		
Distance to nearest road	m	6.6		6.6		(a.6		
Obstruction Type	1	building		build	ding	bi	ilding		
Obstruction Height [OH]	m	6.1		6.1			601		
Obstruction Distance [OD]	m	19.0		20.5		15	8.5		
Collocated Distance	m	3		3					
Unrestricted Airflow	degrees	280			280		280		
Dripline	m	30	0.16501	30		3	30		
	Units	со	GASEOL	OZONE	NO _x		SO ₂		
Probe Inlet Height [IH]	m			/					
Distance to nearest road	m								
Obstruction Type	/								
Obstruction Height [OH]	m								
Obstruction Distance [OD]	m								
Collocated Distance	m			/					
Unrestricted Airflow	degrees								
Dripline	m	/	/			/	Pace/raii		
Are all probes at least 1 me	ter apart?				YES/NO Yes		PASS/FAIL		
		is paved or has vegetative gro	ound cove	r?	yes				
Are all rooftop samplers loo	cated at lea	ast 2 meters away from any st	tructures?		yes				
There MUST be 270 degree	s of unres	tricted airflow around the pro	obe or sam	pler,			Pass		
Obstruction Distance MUST					Pass				
Dripline must be at least 10m away when tree is an obstruction.									
Sampler Inlet Height [IH] Probe Height [IH] Obsturction Height [OH]									
Obstruction Distance [OD]									

4.4 NEAR ROAD ("NRS") 2025 SITE ASSESSMENT

Figure 4-16: "NRS" NORTH-FACING VIEW



Figure 4-17: "NRS" EAST-FACING VIEW



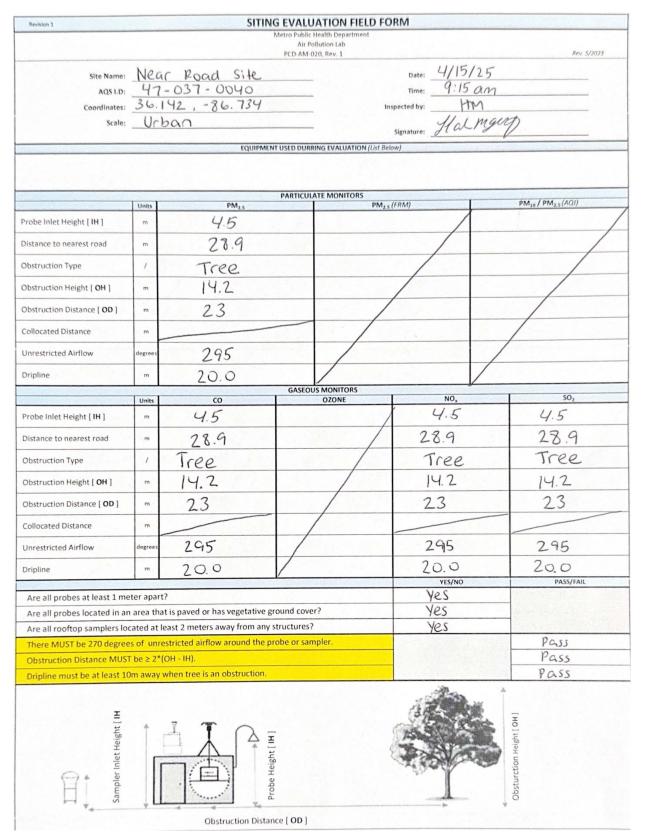
Figure 4-18: "NRS" SOUTH-FACING VIEW



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



Figure 4-20: "NRS" 2025 Site Assessment Form



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

SITING EVALUATION FIELD FORM Rev. 4/12/23 Metro Public Health Department											
Metro Public Health Department Air Pollution Lab PCD-AM-020											
Site Name: Date:											
					Inspected by:						
Scale:Signature:											
	LIST EQUIPMENT USED										
PARTICULATE MONITORS											
7 0 2 0 7-7-71 4-7-70	Units	PM2.5		PM2.5 C	ollocated		PM10				
Probe Inlet Height (IH)	m										
Distance to nearest road	m										
Obstruction Type	7										
Obstruction Height [OH]	m										
Obstruction Distance (OD)	m										
Collocated Distance	m										
Unrestricted Airflow	degrees										
Dripline	m.										
			GA!	SEOUS MONITORS							
	Units	co		ÖZÖNE	NOx		502				
Probe Inlet Height (IH]	m										
Distance to nearest road	m										
Obstruction Type	f										
Obstruction Height (OH)	m										
Obstruction Distance [OD]	m										
Collocated Distance	m										
Unrestricted Airflow	degrees										
Dripline	m										
Are all probes at least 1 meter apar	t?				YES/NO		PASS/FAIL				
Are all probes located in an area th		d or has vegetative ground cover?									
Are all rooftop samplers located at	least 2 m	eters away from any structures?									
	There MUST be 270 degrees of unrestricted airflow around the probe or sampler.										
Obstruction Distance MUST be ≥ 2*(OH - IH). Disting must be at least 10m away when tree is an obstruction.											
Billion in ascent class formalis,	Dripline must be at least 10m away when tree is an obstruction.										
Sampler Inlet Height [IH] Probe Height [IH] Probe Height [IH]											
I	D de										
	Obstruction Distance [OD]										