



# STATE & LOCAL AGENCY QUESTIONS, ISSUES & CONCERNS

REGION 3 QUALTY ASSURANCE WORKSHOP

JUNE 25 – 26, 2014

# PM<sub>10</sub> manual method monitors

## Background:

There is no collocation requirement for continuous PM<sub>10</sub> method monitors in Part 58, either in Appendix A or D, that I could find. The only collocation requirement for PM<sub>10</sub> is in Appendix A, § 3.3.1, which is for manual methods. There is also no reference to a PM<sub>10</sub> collocation requirement in Table A-2 under the automated portion (top of table).

The precision calculation for PM<sub>10</sub> method is given in Appendix A § 4.2.1 and it is based on collocated monitoring. (We report the results of this calculation to EPA as P&A data.)

Also, there is no “Collocation Completeness” or a “Collocation Precision” summary in the AMP600 for PM<sub>10</sub> continuous either.

**MAIN QUESTION: DO WE NEED TO RUN MANUAL METHOD MONITORS FOR PM<sub>10</sub> AT ALL?**

**FOLLOW-UP QUESTION: IF NOT, HOW IS PRECISION CALCULATED, AS THERE IS NO REQUIREMENT FOR COLLOCATION WITH PM<sub>10</sub> CONTINUOUS METHODS THAT I CAN FIND?**

# Incorrect primary monitor assignment in AQS

THE CHESTER PRIMARY PM<sub>2.5</sub> MONITOR IS 420450002- 88101-3; THE POC 1 MONITOR HAS END DATES IN THE MONITOR DETAIL AND THE COLLOCATION DETAIL, AND ALSO IN THE PRIMARY PERIODS TAB IN THE SITE DETAIL, BUT IT IS STILL SHOWING UP AS PRIMARY MONITOR ID IN THE POC 2 “COLLOCATION” TAB IN THE MONITOR DESCRIPTION.

# Incorrect Certifying Agency assignment in AQS

THE CERTIFYING AGENCY FOR SITE 42-003-0010 IS 0851 – PA DEP, NOT “0020 ALLEGANY COUNTY HEALTH DEPARTMENT”. I DON’T KNOW WHEN 0020 WAS CREATED – IT DOESN’T APPEAR TO BE A PQA0 FOR ANY MONITORS. THE ALLEGHENY COUNTY HEALTH DEPARTMENT IN ALLEGHENY COUNTY, PA CODE IS 0021, BUT THIS ONE MONITOR IN ALLEGHENY COUNTY WAS OPERATED AND CERTIFIED BY PA DEP.



# QC CHECKS AND LOW AMBIENT LEVELS

OUR AMBIENT LEVELS FOR MOST POLLUTANTS ARE QUITE LOW, SO OUR QC CHECKS AND PERFORMANCE EVALUATION LEVELS NEED TO BE LOW. THIS CAN BE DIFFICULT – SOMETIMES WE NEED LOW CONCENTRATION GAS CYLINDERS, BUT EPA MAY NOT BE ABLE TO CERTIFY THE CYLINDERS AT THESE LOW LEVELS. SOMETIMES OUR CALIBRATORS ARE LESS RELIABLE AT THE LOW LEVELS; FOR EXAMPLE, OUR AUDIT CALIBRATOR HAS PROBLEMS GENERATING THE LOW LEVELS OF OZONE NEEDED FOR THE NO<sub>2</sub> GPT PERFORMANCE EVALUATION. THESE KINDS OF TECHNICAL ISSUES MAKE IT DIFFICULT TO GET ADEQUATE EVALUATION OF MONITOR PERFORMANCE AT THE LOW END OF THE MONITORING RANGE.

# AQS Report Issues: AMP 300

NO<sub>2</sub> DOES NOT WORK FOR THE 1-HOUR STD – EXAMPLE CALIFORNIA (006-019, 006-025, 006-037)

# AQS Report Issues: AMP 440

THE SO<sub>2</sub> REPORT DISPLAYS 1-HR DAILY MAXIMUMS IN THIS REPORT, BUT THE NO<sub>2</sub> REPORT DOES NOT USE DAILY MAXIMUM. THE 1-HOUR NAAQS FOR BOTH OF THESE POLLUTANTS ARE BASED ON DAILY MAXIMUMS, SO THE AMP440 SHOULD BE CONSISTENT BETWEEN THE TWO.

# AQS Report Issues: AMP 450

1. **PB – PARAMETER CODE 14129 IS STILL NOT AVAILABLE FOR THIS REPORT – THE CODE 14129 IS USED FOR LEAD DATA BEGINNING IN 2009; THE PREVIOUS PARAMETER CODE OF 12128 IS STILL AVAILABLE IN THE REPORT, BUT THE CURRENT CODE IS NOT.**
2. **SO<sub>2</sub> – THE NUMBER OF DAYS>STD ARE STILL BEING CALCULATED IN COMPARISON TO THE FORMER 24HR STD, NOT CURRENT 1-HR STD.**



# AQS Report Issues: AMP 480

## PM<sub>2.5</sub> SUB TEST APPLICATION – INCORRECT VALIDATION OF DV

1. LEBANON (420750100) – 2013 DAILY DV SHOULD NOT BE VALID – 1ST QUARTER 2010 HAS 24% COMPLETENESS; THEREFORE, THE “BELOW NAAQS” SUB TEST IN 40CFR APPX N 4.2(C)(I) IS NOT APPLICABLE
2. KITTANNING (420050001) – 2012 ANNUAL DV SHOULD NOT BE VALID, THE SUB TEST RESULTING VALUE IS >NAAQS; THEREFORE THE SITE FAILS THE SUB TEST FOR THE BELOW NAAQS SUB TEST 40 CFR APPX N 4.1(C)(II)



# AQS Report Issues: AMP 255 & 600

I THINK IT WOULD BE HELPFUL TO DISCUSS THE AMP255, AMP600 AND HOW THEY ARE USED IN THE QA/QC PROCESS. EACH COLUMN OF THESE REPORTS COULD BE DISCUSSED AND HOW THEY ARE IMPORTANT. WHAT THE DATA NEEDS TO LOOK LIKE AND HOW TO GET THE DATA INTO PROPER FORM COMPLYING TO 40CFR TO GET GOOD REPORTS.