Air Resources Board

Mary D. Nichols, Chairman
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Matthew Rodriquez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

October 24, 2014

Mr. Mallory Ham
Ventura County Air Pollution Control District
669 County Square Drive
Second Floor
Ventura, CA 93003

Dear Mr. Ham:

The purpose of this letter is to formalize the roles and responsibilities of both the California Air Resources Board (ARB) and local monitoring organizations (MO) that are under the auspices of ARB's Primary Quality Assurance Organization (PQAO) to ensure compliance with State and federal air monitoring requirements.

As defined in the U.S. Environmental Protection Agency's (U.S. EPA) Title 40 Code of Federal Regulations (40 CFR) Part 58, a PQAO is a monitoring organization or a coordinated aggregation of such organizations that is responsible for a set of stations that monitors the same pollutant(s) and for which data quality assessments can logically be pooled. Each criteria pollutant sampler/monitor at a monitoring station in the State and Local Air Monitoring Stations network must be associated with one, and only one, PQAO.

ARB is the governmental agency delegated under federal law with the authority and responsibility for collecting ambient air quality data as directed by the Clean Air Act. The ambient air monitoring network in California is operated by a combination of ARB and local MOs. It is critical that ARB and local MOs work together, through formalized roles and responsibilities, to collect consistent and reliable ambient air quality data.

Under ARB's PQAO, ARB and MOs should strive to collaboratively address the following common factors to the extent practical:

a) Operation by a common team of field operators according to a common set of procedures.

b) Use of a common Quality Assurance Project Plan and Standard Operating Procedures for State and federally mandated air monitoring projects.

c) Common calibration facilities and standards.

d) Oversight by a common quality assurance organization.

e) Support by a common management, laboratory, or headquarters.

In order to address these common factors, ARB has worked collaboratively with the Ventura County Air Pollution Control District (District) and U.S. EPA to define each agency's roles and responsibilities with regard to the operation of the State's ambient air monitoring network (see attachment). The goal of the roles and responsibilities document is to ensure the generation of high quality, legally defensible data in a collaborative manner.

ARB appreciates the collaborative efforts of the District to define the roles and responsibilities and looks forward to working with them to ensure their effective implementation.

Please contact Mr. Patrick Rainey at (916) 327-4756 or prainey@arb.ca.gov or myself at (916) 322-0960 or mmiguel@arb.ca.gov, if you have any questions.

Sincerely,

Michael Miguel, Chief
Quality Management Branch
Monitoring and Laboratory Division

Attachment

cc. See next page.

cc. Michael J. Villegas, Air Pollution Control Officer
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Dr. Michael T. Benjamin, Chief
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Patrick Rainey, Manager
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Maria Salomon
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Attachment

PRIMARY QUALITY ASSURANCE ORGANIZATION ROLES AND RESPONSIBILITIES FOR THE AIR RESOURCES BOARD AND VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Five common factors have been identified by the U.S. Environmental Protection Agency (U.S. EPA) that should be considered in defining a Primary Quality Assurance Organization (PQAO). Under the Air Resources Board (ARB) PQAO, ARB and monitoring organizations (MOs), will strive to collaboratively address the following common factors to the extent practical. ARB has defined the roles and responsibilities of ARB and MOs within ARB's PQAO in regard to operation of the ambient air monitoring network in order to ensure the generation of high quality, legally defensible data.

1. Operation by a common team of field operators or according to a common set of procedures

ARB recognizes the unique air monitoring challenges that face California and that field operations by a common team may not be feasible. ARB and MOs acknowledge the need to strive for uniformity of procedures, thus both parties agree to work together toward employing consistent and reliable field operations.

ARB Responsibilities:

a) Maintain and disseminate a Quality Management Plan (QMP). ARB will regularly request input from MOs within ARB's PQAO and agrees to review and update the QMP as needed. ARB will communicate updates to MOs accordingly.
b) Review and approve alternative QMPs prepared by MOs seeking ARB and/or U.S. EPA approval.
c) Maintain a PQAO contact list and working webpage to disseminate information.
d) Serve as a liaison between MOs within ARB's PQAO.
e) Provide adequate training on key air monitoring fundamentals related to operations, maintenance, quality assurance/quality control, and data management procedures.
f) Facilitate Ambient Monitoring Technical Advisory Committee (AMTAC) meetings and information updates. Topics may include field, laboratory, quality assurance, and data management related items.
g) Participate in the California Air Pollution Control Officers Association (CAPCOA) air monitoring committee meetings and other informational forums.

Ventura County Air Pollution Control District (APCD) Responsibilities:

a) Utilize and follow ARB's QMP. Any deviations from ARB's QMP will be specified in an addendum and submitted to ARB for review and approval.
b) Provide a supervisory level (or designee if non-supervisory level) PQAO point-of-contact to ARB. The PQAO contact will be added to a list serve to allow for effective and timely dissemination of information.
c) Participate in ARB and U.S. EPA sponsored ambient air monitoring training.
d) Participate in AMTAC meetings and review information updates.
e) Participate in CAPCOA Monitoring Committee meetings and other informational forums.

2. Use of a common Quality Assurance Project Plan (QAPP) and Standard Operating Procedures (SOP) for state and federally mandated air monitoring projects.

ARB Responsibilities:

a) Maintain and disseminate an ARB and/or U.S. EPA QAPP for State and federally mandated air monitoring projects or programs.
b) Maintain and disseminate SOPs for monitoring and analysis. These SOPs may also include forms (i.e., check sheets, calibration forms, maintenance forms, etc.).
c) Provide notification of updates/revisions, as they occur, to ARB's QAPPs and SOPs via the PQAO point-of-contact list.
d) Review and approve alternative QAPPs and SOPs prepared by MOs.

Ventura County APCD Responsibilities:

a) Utilize and follow ARB's QAPPs for meteorological, particulate matter (PM10, PM2.5), nitrogen dioxide (NO2), and ozone (O3) air monitoring projects. Any deviations from ARB's QAPPs will be specified in an addendum and submitted to ARB for review and approval. [Note: Operation of the Photochemical Assessment Monitoring Stations Network is conducted according to approved procedures]
b) Utilize and follow ARB or ARB approved SOPs for meteorological, PM10, PM2.5, NO2, and O3 air monitoring projects. Any deviations from approved SOPs will be specified in an addendum and submitted to ARB for review and approval.
c) District management will review ARB's document repository at http://www.arb.ca.gov/aaqm/qa/pqao/repository/qm_docs.htm on an established schedule to ensure that all quality management documents utilized by MO are accurately represented and consistent with operating practices. MO must notify ARB of any changes as they occur.

d) Make available to ARB a record or list of all quality management documents (QMP, QAPP, SOPs, training plan, etc.) utilized by Ventura County APCD's ambient air monitoring network.

If Ventura County APCD conducts a special purpose monitoring program funded by U.S. EPA, MO will seek quality assurance assistance from U.S. EPA or ARB's Quality Management Branch. Such monitoring is required to be covered by quality assurance documents prior to sample collection.

3. Common calibration facilities and standards

MOs within ARB's PQAO are encouraged to utilize the services provided by ARB's Standards Laboratory for certifications, calibrations, and verifications. Organizations choosing to utilize external calibration facilities or vendor produced standard materials will provide documentation of traceability upon request by ARB or U.S. EPA.

ARB Responsibilities:

a) Provide timely certification, calibration, and verification services that meet or exceed Title 40 Code of Federal Regulations (40 CFR) Part 58 requirements via ARB's Standards Laboratory upon request.

Ventura County APCD Responsibilities:

a) Utilize ARB's Standards Laboratory services for O3 transfer standards.
b) Utilize outside vendors for certification, calibration, and verification services for flow standards, gas standards, and meteorological equipment.
c) Maintain a schedule and record of certification dates and a record of traceability to NIST that are available to ARB or U.S. EPA upon request.

Additionally, ARB may provide equipment acceptance testing, repair, and field calibration services to Ventura County APCD upon prior or mutual agreement, which may depend upon budget feasibility and staff availability.

4. Oversight by a common quality assurance organization

ARB Responsibilities:

a) Ensure that ARB's PQAO includes all pollutants required by U.S. EPA for its ambient air monitoring network.

b) Conduct annual Performance Evaluation (PE) of MO for meteorological, NO2 and O3 parameters, and semi-annual audits for PM10 and PM2.5, as required in 40 CFR Part 58, Appendix A, including Sections 3.2.2 and 3.2.4.
c) Conduct annual siting evaluations at each air monitoring station to determine compliance with 40 CFR Part 58, Appendix E, and consistency with current Air Quality System (AQS) pollutants.
d) If an instrument or analyzer is found to be outside acceptable limits, ARB will initiate an Air Quality Data Action (AQDA). The AQDA will request the MO to correct the identified deficiencies and ensure associated ambient air data are verified to be good quality data. To ensure compliance, ARB will conduct are-audit to verify the corrective action once the problem has been resolved and review data in AQS to ensure any recommended data action has been taken (i.e., flagging, invalidation, etc.).
e) Conduct technical systems audits (TSA) of all MOs within ARB's PQAO on a schedule of every 3-5 years.
f) Maintain a Corrective Action Notification (CAN) database, to be used by monitoring agencies to report operational problems, instrument malfunctions, and/or any items needing corrective action or investigation. ARB will follow-up to verify that appropriate action was taken to close the CAN and perform an annual review of the CAN database for systematic issues.
g) Provide procedures and criteria for data acceptability and corrective action determination.
h) Provide procedures and criteria for data verification and validation to be performed prior to upload to AQS.
i) Provide training on data verification and validation procedures as part of the PQAO Air Monitoring Training.
j) Perform an annual evaluation of the statistical summaries of quality assurance and quality control data for all MOs in ARB's PQAO and distribute results.

Ventura County APCD Responsibilities:

a) On an annual basis review that pollutants measured by MO that are included in ARB's PQAO are accurately reflected in the Annual Network Plan.
b) Participate in criteria pollutant and particulate PE audits (meteorological, PM10, PM2.5, NO2, and O3) conducted by ARB.
c) Participate in U.S. EPA required technical system audits conducted either by ARB or U.S. EPA.
d) Utilize and follow ARB's procedures to validate meteorological, PM10, PM2.5, NO2, and O3 air data quality against ARB or U.S. EPA established acceptance criteria prior to upload to AQS. Any deviation to ARB's procedures will be specified in an addendum and submitted to ARB for review and approval.
e) Upload MO validated data (meteorological, PM10, PM2.5, NO2, and O3) to AQS in an AQS compatible format within 90 days following the end of each quarter and provide in accordance with U.S. EPA requirements.

f) Participate in data verification and validation training provided by ARB and/or U.S. EPA.
g) Review data in AQS twice per year to verify accuracy and completeness (AMP 256 and 430 reports).
h) Review data in AQS (AMP 600 and 450 NC reports) on an annual basis to verify accuracy and completeness of data for certification purposes.
i) Perform annual certification of data by May 1st of each year.
j) Utilize ARB's CAN process to report instrument malfunctions, operational problems, impending data actions in U.S. EPA's AQS, and/or any items needing corrective action or investigation within 45 days of determination of issue. Management will use appropriate discretion to determine issues deemed to be anomalous verses routine occurrences.
k) Resolve AQDAs, CANs, and TSA findings, and develop corrective action plan as appropriate, within 45 days of issuance.
l) Utilize the CAN process, as appropriate, to communicate to ARB when data have been altered or modified after submittal so ARB can review the justification and adjust data in AQS accordingly.

Data collected from Special Purpose Monitoring (SPM) sites using a Federal Reference Method, Federal Equivalent Method, or Approved Regional Method should be evaluated against the requirements in 40 CFR Part 58.11, 58.12, and Appendix A; and submitted to AQS according to 40 CFR Part 58.16, as applicable.

5. Support by a common management, laboratory or headquarters

Operating California's complex ambient air monitoring network requires ARB to work collaboratively with each MO. In order to accurately assess the MO's monitoring network, both parties will document and evaluate potential or scheduled modifications to the air monitoring network.

ARB Responsibilities:

a) Provide and review an annual survey questionnaire regarding planned changes to the air monitoring network (i.e., new/removed instruments, site closures, new sites, contracted services, etc.) for MOs in ARB's PQAO that are not drafting their own Annual Network Plan as required by 40 CFR Part 58.10. ARB will review completed questionnaires within 30 days of receipt and provide feedback, as necessary.
b) Participate in annual meeting/teleconference during the network review period to discuss ARB's PQAO monitoring network status.
c) Provide laboratory analytical support as required (i.e., PM2.5 and PM10 mass analysis, toxics analysis, speciation, etc.) upon prior or mutual agreement.

Ventura County APCD Responsibilities:

a) Complete the annual questionnaire regarding monitoring network changes within 30 days of receipt from ARB.
b) Coordinate all site changes (i.e., openings, closures, relocations), not mentioned in the annual questionnaire to ARB. Notify ARB of anticipated changes before they occur and obtain prior approval before executing it, barring exceptional circumstances.
c) Participate in ARB's PQAO monitoring network status meetings/teleconferences.
d) Provide sample return and proper documentation of field sample collection activities (i.e., chain-of-custody, sample collection dates and times, etc.) within established timeframes.

If circumstances should arise that prevent either ARB and/or Ventura County APCD from meeting the above mentioned responsibilities, the agencies will work collaboratively to ensure that the common goal of generating legally and scientifically defensible data throughout the PQAO monitoring network is met. As needed, the agencies will work with U.S. EPA Region 9 to assist in meeting PQAO requirements.