

QA Strategy Workgroup Conference Call Notes
Wednesday 11/13/02

Attendees

Anna Kelley	Mark Shanis
Chris McMillan	Melinda Ronca-Battista
Danny France	Melvin Schuchardt
Dennis Mikel	Michael Papp
Don Gourley	Mustafa Mustafa
Donavan Rafferty	Nealson Watkins
Elisa Dickerson	Norm Beloin
Gordon Jones	Paul.Sanborn
John Glass	Rachel Townsend
Keith Duncan	Rayna Broadway
Kuenja Chung	Richard Heffern
	Tom Parsons

Progress

The call was devoted to revising 40 CFR Part 58 Appendices's A and B. Some initial points were made in order to try to get everyone on the same page:

The primary focus of the 58 Appendix A is to develop a quality system that will provide data of adequate quality to make comparisons to the NAAQS. Although data at all concentrations is important, the DQOs that we will develop for each criteria pollutant will be focused on making comparisons to the NAAQS and therefore the probability of decisions errors around the NAAQS values. It was mentioned that there is interest in low concentration data for a number of other uses (models, SIP planning) and that 58 does not do a good job of ensuring the data at low concentration levels. I think a way to solve this is to explain in the introduction the primary objectives of 58 (meet DQOs for NAAQS comparison... see next paragraph) but also address that there may be other objectives for which the data will be used and it will be incumbent on the State/Local/Tribal Agency to address the data quality needs of these "other" objectives. The Redbook will also expound on the scenario and maybe, by providing some additional QC (i.e., zero response performance per Rachael Townend's memo) we may be able to, at a minimum, report on the accuracy/precision of low concentration data.

On the other hand, based on the direction of the Monitoring Strategy, there may be a data collection objective that is a higher priority than NAAQS comparisons for some of the pollutants that are in most cases under control in many areas (i.e., CO SO₂, NO₂). Maybe trend detection is more important. In these cases, maybe DQOs could be developed for NAAQS comparison and trends purposes and the data quality requirements that served both objectives would be adopted. The bottom line is that primary objectives for the criteria pollutant data need to be identified so that the measurement quality objectives for the national program can be identified. However, CFR must also make sure that the data

users/decision makers realize that data collected for SLAMS (for lack of a new name) may not be useful for some data analysis purposes.

There was discussion in merging Appendix A and B into one section. It was felt that this could be accomplished since most of the QC information is the same. However there are some differences in the objectives of collecting the data and funding authorities (EPA for App A and the “permit granting authority” for App B) that need to be defined in the introduction.

Additions/revisions to the introductory sections include

- < update with current EPA QA policy (i.e., quality management plans and QA project plan policy)
- < Bringing in the roles and responsibilities of the “QA Manager” - We need to be sensitive to what term we use, but the objective is to describe the appropriate function of this person at the ambient air monitoring level.
- < Bringing in the concept of the graded approach to QA that the Workgroup developed.
- < Providing some language on the requirement for adequate resources to accomplish QA activities.
- < Revise language around required participation for NPAP when NPAP does not visit all reporting organizations
- < Providing a new term for “reporting organization” to ensure proper use in AQS. This would entail adding a variable to AQS. As an example one variable could be called “data submitting organization” and a second variable called “quality assurance organization” could be used to define what is currently called reporting organization in Part 58.

Redbook revisions will parallel the revision to CFR. In general CFR revisions will take place first, but due to the length of time it will take to promulgate the regulations, the Redbook should be able to catch-up and be ready at the time the rule is approved.

Logistics

- < We’ll try to have a call every two weeks in order to maintain some momentum. Since two weeks will put us into Thanksgiving week, the next call will be the week of **December 2**.
- < Mike will make changes directly to CFR using redline/strikeout and a different font. The Workgroup will review the changes and provide comment / edits back to Mike before the next call or at a minimum during the next call.
- < The first half of each conference call will be used to discuss and agree on the changes made to CFR on the previous call. The second half of the call will be used to review and comment on a new section.

