

QA Strategy Workgroup Conference Call Notes

Thursday 8/16/01

Attendees

Norman Beloin	Andy Johnson
Mustafa Mustafa	Mike Miguel
Danny France	Richard Heffern
Jerry Burger	Melinda Ronca-Battista
Jim Littell	Terry Rowles
Gordon Jones	Don Gourley
Kuenja Chung	Michael Papp
Mat Plate	Dennis Mikel
Rachael Townsend	Mark Shanis
Elisa Dickerson	Shelly Eberly
Tom Parsons	Mark Schmidt
Donovan Rafferty	Tim Hanley
Anna Kelly	Joe Elkins
Jerry Sheehan	

Notes

The workgroup started out trying to get a handle on the goals and objectives of the Workgroup. The following is a brief synopsis of some of the discussions:

Time line - We are trying to develop a product for an October time frame. This product would be a synopsis of our mutually agreed upon elements of a quality system. Probably on the order of 10 pages.

Breakout Workgroups - the question was posed as to whether we should try to tackle this project as one large workgroup and break into smaller workgroups that would tackle some defined phase of the quality system. In addition the QA Strategy outline initially had groups broken out along the lines of monitoring organization (State/local/Tribal), EPA Regions, and Headquarters. The Workgroup agreed that breakout groups would be advantageous but thought that each group should have a mix of people from the three types mentioned above. It was decided that the groups would be developed along the quality system elements of 1) Planning 2) Implementation and 3) Assessment/Reporting. OAQPS will review the ambient air program and try to place the various quality assurance activities into one of the three elements mentioned above as well as the questions that are asked in the QA Strategy Outline and what was sent out prior to the call.. The workgroup participants will then select there 1st and 2nd choices for the element they choose to work with. Hopefully we will have a good mix of individuals in each breakout workgroup. Also workgroup participants can work on any or all workgroups if they so desire. Also, it is anticipated that we will maintain full Workgroup meetings, especially as we start out, in order to set the stage and provide a good sense of what elements of a quality system pertain to the Ambient Air Monitoring Program.

Breakout Workgroup Chairs - Melinda Ronca-Battista and Rachel Townsend agreed to be co-chairs of one breakout workgroup, the other two chairs are Gordon Jones and Mike Papp. Chairs may

Development of a quality system - Start the discussions at a higher level. Pose the question “What are the elements of an adequate quality system for any ambient monitoring program?”. Once these components are identified and we have consensus on them, we could apply the elements to any particular monitoring method (e.g., CO, SO₂) or program (e.g., toxics monitoring). An example of this might be data quality objectives (DQO). We currently have DQOs for only the PM_{2.5} criteria pollutant. We might come to consensus that methods for any monitoring program should be performance based. In order to identify adequate performance characteristics we might agree to use the DQO process. This would then become an element to include in the QA Strategy and eventually CFR.

What is a quality system- The following is a definition in the document “American National Standard- Specifications and Guidelines for Quality Systems for Environmental Data Collection and Environmental Technology Programs (ANSI/ASQC E4-1994)

“A structured and documented management system describing policies, objectives, principles, organizational authority, responsibility, accountability, and implementation plan for ensuring quality in it’s work processes, products (items), and services. The quality system provides a framework for *planning, implementing, and assessing* work performed by the organization and for carrying out required QA and QC.”

EPA QA Policy is structured around ANSI- E4. The ANSI -E4 document provides information and guidance very similar to the EPA’s requirement for quality management plans (QMPs). The products that this workgroup might develop may be very similar to a National QMP. Joe Elkins made a statement that a number of years ago OAQPS and the EPA Regions set out to develop what was called a National Ambient Air Monitoring Plan. The intent of the plan was to set a consistent “QA roadmap” for the Regions and Headquarters to follow in the implementation of the Ambient Air Monitoring Program. This NAAMP would have been placed into each Region’s QMP and the OAQPS QMP. This document was never completed but may offer some insight and guidance to this process. OAQPS will distribute relevant sections of this document to the workgroup. There was a comment related to the fact the EPA quality staff have certain requirements for QMPs and quality systems that may not be applicable to the Ambient Air Program. Based on the OAQPS relationship with the Quality Staff, it was felt that the Quality Staff are somewhat flexible in their interpretation of their requirements and guidance. As long as we developed a system that provided a mechanism for ensuring and demonstrating the collection of data of adequate quality for decision makers, they would find it acceptable.

What is the extent of our work? - Basically we start from a clean slate. The major focus of the QA Strategy is 40 CFR Part 58 APP A. These requirements are all on the table for revision. However, as we get into discussion of changes to this appendix they could effect other parts of CFR. For example, if we move towards performance based measurements and DQOs, our language could effect the Federal Reference Method (Part 50) as well as the reference and equivalency testing and approval (Part 53) .

Who “buy’s off” on the quality system First, any revisions we make will have buy off from the workgroup. This mix in the workgroup should be representative of the larger monitoring community and in general what is acceptable to the workgroup will probably be acceptable to the larger community. The information developed from the workgroup will be available for public comment. The workgroup will probably generate two types of revisions, ones related to changes in CFR and changes related to guidance. Changes to CFR must go through a formal process with time for public comment and response to comments. The workgroup could remain involved in this process. Changes to guidance are less onerous. We can put changes to guidance on AMTIC for comment.

Are we trying to improve quality or are we trying to collect data at less cost more efficiently for the same quality? - The answer could be both. I think our goal should be to develop a quality system that allows one to determine their data quality needs which would determine the costs for that level of quality. In some cases we may need to improve data quality which could cost more, in other cases, we may be fine with the data quality we have or could actually get by with data of less certainty. In either case, the goal would be to collect the data by the most efficient and cost effective method once we defined our data quality needs. Putting this into the context of the QA Strategy- we might say something like “all monitoring programs will be required to develop objectives in such a manner that determines the allowable data uncertainty and then ensure that the uncertainty can be controlled at quantified by addressing the following data quality indicators”

Action Items:

The following are action items

OAQPS -

Develop a table with the quality system headings of Planning, Implementation, Assessment. Include the various QA activities of the ambient air monitoring under these heading as well as the questions that have been posed in the QA Outline and workgroup members.

Distribute the information on the NAAMP.

Distribute some information on quality systems.

Schedule the next conference call (Tentatively week of -8/27)

Workgroup Members -

Take a look at the table (from above) and select your first and second choice for breakout workgroup participation. If you actually want to participate in more than one, indicate that.

