



**Santa Barbara County
Air Pollution Control District**

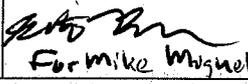
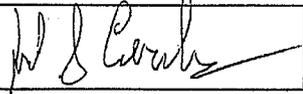
Our Vision  Clean Air

SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT

**Addendum to ARB QMP Vol. 1(July 2013)
Document and Justification**

June 2016

**SBCAPCD Addendum to ARB QMP Vol. 1(July 2013)
Document and Justification**

| APPROVALS | | |
|---|--|----------|
| CALIFORNIA AIR RESOURCES BOARD | | |
| | Signature | Date |
| Mike Miguel, Chief Air Quality Management Branch |  For Mike Miguel | 6-9-2016 |
| SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT | | |
| Joel Cordes, IT/Monitoring Supervisor |  | 6-7-2016 |

Section 1.2 PQAO Responsibilities (page 3 of 53)

Proposed Modifications:

Proposed Deletion to Section:

None

Proposed Addition to Section:

The Santa Barbara County Air Pollution Control District (SBCAPCD) agrees to follow the Roles and Responsibilities outlined in the Roles and Responsibilities correspondence from the Air Resources Board (ARB) and attachment dated September 29, 2014. This includes, performing required quality control (QC) checks and calibrations, processing and management of all data and directly uploading data to the EPA Air Quality System (AQS). The IT and Monitoring Supervisor at SBCAPCD is responsible for ensuring the timely completion of QC activities that are required to be performed by SBCAPCD monitoring staff. The District will also certify data from their network each year. SBCAPCD will be responsible for drafting, obtaining public comment, and submission of the annual Network Plan and the Network Assessment, submitted every five years.

The District agrees to follow the ARB QMP, QAPP, and SOP's with approved addenda outlining any difference in procedure utilized at SBCAPCD.

Justification for Proposed Modification:

The proposed addition to Section 1.2 will clarify the roles of ARB and SBCAPCD.

Section 1.3 Network Overview (page 4 of 53)

Proposed Modifications:

Proposed Deletion to Section:

None

Proposed Addition to Section:

The SBCAPCD monitoring network is comprised of two different types of monitoring stations.
SLAMS STATIONS- District staff operates a network of four SLAMS stations (Goleta, Lompoc H Street, El Capitan, and Santa Ynez) within Santa Barbara County. ARB operates two SLAMS stations (Santa Barbara and Santa Maria) within Santa Barbara County.
PSD Stations- Prevention of Significant Deterioration (PSD) stations were established by SBCAPCD in the mid 1980's when rapid oil and gas production and processing were being developed. These monitoring

stations were established as a permit requirement for these new oil and gas facilities, and are required for the life of these facilities. The PSD site operation and data validation/processing is the responsibility of the permit holder. Some of the permit holders have contracted with the SBCAPCD to operate the PSD sites they are responsible for, while other permit holders have elected to hire independent consultants to perform the site operation of the PSD sites they are responsible for. PSD sites operated by the District follow the exact same QA/QC process as SLAMS sites. PSD sites operated by independent contractors follow the QA/QC procedures outlined in each projects District approved monitoring plan and QA manual, which meet or exceed all US EPA requirements. All site data, records, and logs from the PSD sites operated by consultants hired by the permit holder are reviewed monthly by SBCAPCD monitoring staff and/or a consultant hired by SBCAPCD to ensure site operation complies with approved QA/QC procedures.

Justification for Proposed Modification:

Section 1.3 does not provide information on the SBCAPCD network and the specifics of the SLAMS and PSD site operation and responsibilities. Including this information will provide a more complete understanding of the SBCAPCD monitoring network.

Section 1.5 Santa Barbara County Air Pollution Control District Organization (page 7 of 53)

Proposed Modifications:

Proposed Deletion to Section:

None

Proposed Addition to Section:

The SBCAPCD is organized into four divisions:

1. Administration
2. Compliance
3. Engineering
4. Technology and Environmental Assessment

The monitoring program is under the Administration Division, with the IT and Monitoring Supervisor serving as the air monitoring manager for the District. Within the Administration Division, three air quality monitoring specialists, in coordination with the IT and Monitoring Supervisor, perform all the technical tasks involved in operating and reporting data from the SBCAPCD air monitoring network. The three air quality monitoring specialists report directly to the IT and Monitoring Supervisor. The IT and Monitoring Supervisor reports to the Administration Division Manager.

Justification for Proposed Modification:

Section 1.5 provides information on the ARB organization, but does not include SBCAPCD. This modification will include the District organization in the QMP.

Section 3.3 New Employee Orientation and Training (Page 18 of 53)

Proposed Modifications:

Proposed Deletion to Section:

First Paragraph of Section 3.3

Proposed Addition to Section:

New staff receives on-the-job training from senior program staff and management. Additionally, each new staff member will be placed on either a 12 or 6 month probationary period. New employees on a six-month probationary period will receive progress reports at 2 and 4 months with a formal evaluation of performance at 6 months. New employees on a 12-month probationary period will receive progress

reports at 3, 6, and 9 months with a formal evaluation at 12 months. Progress reports and formal evaluations of monitoring staff are performed by the IT/Monitoring Supervisor.

Justification for Proposed Modification:

The replacement paragraph for Section 3.3 outlines new employee orientation and training specific to the SBCAPCD.

Section 3.4 Continuing Education and Training (Page 19 of 53)

Proposed Modifications:

Proposed Deletion to Section:

None.

Proposed Addition to Section:

SBCAPCD encourages continued education and training for monitoring staff. The IT/Monitoring Supervisor works with each monitoring employee to suggest technical education and training opportunities that will provide the greatest benefit for the employee. The District also has a formal policy providing funding to pay for employee registration/membership in professional organizations (District Policy # 1100.057.1996) in order to encourage further professional development. Additionally, the District has a formal Injury & Illness Prevention Program that requires safety training for new employees and continued education in identification and avoidance of unsafe practices.

Justification for Proposed Modification:

The added paragraph to Section 3.4 provides the specific education and training programs at SBCAPCD.

Section 4.4 Solicitation of Contracts (Page 21 of 53)

Proposed Modifications:

Proposed Deletion to Section:

Paragraph 1 of Section 4.4

Proposed Addition to Section:

Contracts involving SBCAPCD and an outside contractor are classified as Standard Agreement. All contracts over \$1,000 are managed by Santa Barbara County Purchasing Department. These agreements are solicited through a formal, informal competitive bidding process, or sole source contract. Formal competitive bidding is directed by the County Purchasing, and is widely advertised to prospective bidders. Informal bids can be received either verbally or in writing at any time and does not require advertising. Contracts over \$25,000 require formal competitive bid, unless a sole source justification is approved by County Purchasing. Contracts over \$100,000 require SBCAPCD Board approval.

Justification for Proposed Modification:

The replacement text of paragraph 1 of Section 4.4 provides the procedures followed at SBCAPCD involving contract solicitation.

Section 4.5 Acceptance Test Procedure (Page 21 of 53)

Proposed Modifications:

Proposed Deletion to Section:

All of Section 4.5

Proposed Addition to Section:

Monitoring staff performs testing of all new equipment, as well as equipment that has undergone significant repair to ensure that the equipment meets the required specifications for its use prior to its deployment. All equipment functions are checked in the monitoring laboratory to ensure proper

function. Analyzers and samplers are leak tested and flow(s) are verified/calibrated. Air Quality analyzers receive a multi-point calibration to ensure a linear response. Daily calibration checks are performed on air quality analyzers to ensure zero and span drift is within the allowable tolerance. After new or repaired equipment is deployed for field use, the critical operational criteria is closely monitored to ensure proper function of the equipment.

Justification for Proposed Modification:

The replacement Section is needed to describe the SBCAPCD acceptance testing procedures.

Section 5.2 Responsibility for Documents and Records (page 22 of 53)

Proposed Modifications:

Proposed Deletion to Section:

None.

Proposed Addition to Section:

The District monitoring staff is responsible for updates or modifications to any and all QA/QC documents. Under the guidance and approval of the IT/Monitoring Supervisor, all changes to the air monitoring quality documents are performed by the monitoring staff. As needed, changes or addendums to ARB or EPA QA/QC protocols will be submitted for review and approval by ARB prior to implementation.

Justification for Proposed Modification:

The proposed added text provides the specific responsibilities for air monitoring documents and records at SBCAPCD.

Section 5.3 ARB Document Retention Policy (page 23 of 53)

Proposed Modifications:

Proposed Deletion to Section:

All of Section 5.3

Proposed Addition to Section:

5.3 SBCAPCD Document Retention Policy

The SBCAPCD Document Retention Policy (Policy 1100.065.13, attached) is followed regarding archiving and disposal of air monitoring documents and files. The policy specifies that air quality data be retained for a fiscal year plus 5 years. For purpose of this policy, air quality monitoring files include not only ambient concentration data, but also any associated meteorological data, QA/QC records, log books, meta-data, and supporting data/records. Site operators maintain electronic copies of their stations log books at their stations for at least the previous three years.

Justification for Proposed Modification:

The replacement text provides the specific document retention policy at SBCAPCD.

Section 6.1 Introduction (Page 25 of 53)

Proposed Modifications:

Proposed Deletion to Section:

Second paragraph of Section 6.1.

Proposed Addition to Section:

District monitoring staff utilizes AirVision from Agilair Inc. as the primary data acquisition and data management system. AirVision is utilized for all storage, editing, reporting, and archiving of ambient air

quality and meteorological data. AirVision is supported by Agilaire Inc. and as such, all updates and technical support are under paid contract. AirVision is also equipped with Agilaire's Automated Data Validation Program (ADVP) module that is programmed by District staff to automatically flag data based on pre-defined criteria such as higher than typical values, lower or negative values, rate of change, etc. In addition to the AirVision data system, the monitoring staff utilizes a custom designed Microsoft SQL Server database to manage station log entries, spare parts inventory, traceability of pollutant standards, and tracking of equipment location. Microsoft Outlook is utilized for tracking of regular repeating and other monitoring related tasks. Databases are managed by air monitoring staff and supported by District IT staff which functions as the system administrator. The District IT system administrator has administrative rights with a higher level of access to the database. Data files and databases are stored on secured server(s) and backed up to tapes, which are managed by District IT staff.

Justification for Proposed Modification:

The replacement text for the second paragraph of Section 6.1 provides the details of computer hardware and software utilized by the SBCAPCD.

Section 6.2 Data Management System (Page 25 of 53)

Proposed Modifications:

Proposed Deletion to Section:

All of Section 6.2

Proposed Addition to Section:

Data is acquired at each monitoring station by a dedicated data logger. The station data loggers are either Agilaire 8832 or Agilaire 8872 data loggers equipped with software specifically designed for ambient air monitoring data acquisition. The station data logger gathers and stores minute and hourly data, as well as auto and manual calibration results. Data security is controlled by requiring a user name and password. The AirVision data management system polls each data logger each minute, transferring all minute, hourly, and calibration data to the AirVision SQL database via broadband internet connection. The SQL database is backed up nightly to tape, and tapes are stored offsite

Data gathered from air monitoring sites are reviewed for accuracy and completeness. The AirVision software utilizes various techniques to check the reliability of the data. In the event of a database transcription error, AirVision will generate a log of the error in the database server. If a station data logger loses communication with the server, it will queue the data files for the missed hours and send the queue once communications are established. Station operators can also request a manual data poll with AirVision.

The station data loggers and central AirVision data management system is tested through daily use by site operators. Site operators have the primary responsibility for distinguishing valid or invalid data. If issues are identified, the site operator must contact the IT/Monitoring Supervisor to assist in addressing the issue. It is the responsibility of the site operator to document the issue and the corrective action taken, as appropriate.

Justification for Proposed Modification:

The replacement text for this section provides the specific Data Management tools utilized by SBCAPCD, which are different than the tools utilized by ARB.

Section 6.6 Air Quality System (Page 27 of 53)

Proposed Modifications:

Proposed Deletion to Section:

None.

Proposed Addition to Section:

The SBCAPCD monitoring staff is responsible for review, validation, submittal and any necessary modification of ambient air monitoring data into the EPA Air Quality System (AQS) for the monitors that it operates as well as PSD monitors operated by consultants. AQS files are generated by the AirVision software. Air monitoring staff verifies that all data passes the AQS QC statistics screening and resolves any issues preventing complete upload and/or posting. In addition, monitoring staff confirms that any submitted data is complete and that AQS confirms District's data reporting by executing data completeness reports every time data is submitted.

Justification for Proposed Modification:

The added text for Section 6.6 specifies that the SBCAPCD monitoring staff is responsible for AQS submissions.

Section 9.9 Year End AQS Submittal and Summary Report (Page 34 of 53)

Proposed Modifications:

Proposed Deletion to Section:

None.

Proposed Addition to Section:

Following the end of each calendar year, the SBCAPCD monitoring staff produces an Annual Air Quality Report for presentation to management and the public. The report summarizes continuous monitoring data submitted to AQS for the prior calendar year and how the year's data compares to Federal and State air quality standards. The report includes data from all regulatory air monitoring stations that operate in the Santa Barbara County, including those operated by the SBCAPCD, contractors operating PSD sites, and those operated by ARB. Tables and graphical representations are utilized to indicate the highest measurement values for each parameter, violations of State and Federal air quality standards. The reports are located on the District website at: <http://www.ourair.org/sbc/annual-air-quality-report/>

Justification for Proposed Modification:

The added text for Section 9.9 provides the specifics of the Annual Air Quality Report published by SBCAPCD monitoring staff.

Section 9.11 Annual Monitoring Network Report (page 35 of 53)

Proposed Modifications:

Proposed Deletion to Section:

None.

Proposed Addition to Section:

By July 1 of each year, the SBCAPCD prepares its own Annual Network Plan (ANP) and submits it to EPA for approval, with a copy to ARB to meet the requirements of 40 CFR, Part 58.10. Additionally, to further comply with 40 CFR, Part 58.10, SBCAPCD prepares an Ambient Air Monitoring Network Assessment for Santa Barbara County every five years, on the same schedule as ARB, and assesses the same factors as described above for ARB's Network Assessment.

Justification for Proposed Modification:

The proposed added text for Section 9.11 outlines the responsible parties (per the Roles and Responsibilities agreement) and guidelines utilized by the SBCAPCD in drafting these two reports.

Section 9.13 Annual Certification Letter and Summary Report (page 35 of 53)

Proposed Modifications:

Proposed Deletion to Section:

None.

Proposed Addition to Section:

SBCAPCD monitoring staff is responsible for submitting ambient air quality data to AQS for SLAMS and special purpose monitors operated by the District as well as PSD sites in Santa Barbara County. In accordance with 40 CFR, Part 58, Section 15, SBCAPCD submits an annual data certification letter to U.S. EPA by May 1 of each year. Along with the annual certification letter, SBCAPCD also submits AQS reports as required by federal regulations. These reports include both criteria and non-criteria data for which SBCAPCD is the certifying agency. SBCAPCD certifies that the previous year of ambient air data and any previously certified data that was modified is complete and accurate.

Justification for Proposed Modification:

The added test to Section 9.13 specifies that the SBCAPCD is responsible for the annual certification letter and summary report, per the Roles and Responsibilities agreement.