

## SLOCAPCD Proposed Addendum to ARB QMP Vol. 1(July 2013) Document and Justification

### 1.2 PQAO Responsibilities (page 3 of 53)

#### Proposed Modifications:

##### *Proposed Deletion to Section:*

None

##### *Proposed Addition to Section:*

The San Luis Obispo County Air Pollution Control District (SLOCAPCD) agrees to follow the Roles and Responsibilities outlined in the Roles and Responsibilities correspondence from the Air Resources Board (ARB) and attachment dated June 9, 2014. This includes SLOCAPCD taking full responsibility for operation of the District's eight stations monitoring network, 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 Planning, Monitoring & Outreach manager at SLOCAPCD is responsible for ensuring the timely completion of QC activities that are required to be performed by SLOCAPCD monitoring staff. The District will also certify data from their network each year. Additionally, SLOCAPCD 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 current ARB QMP document (version herein identified in this QMP addenda is July 2013), with exception of the sections specified in this SLOCAPCD ARB QMP proposed addendum. The District agrees to follow the ARB QAPP (SLOCAPCD has also submitted specific addenda for approval) and SOP's with approved addenda outlining any difference in procedure utilized at SLOCAPCD.

#### Justification for Proposed Modification:

Section 1.2 does not specify the specific PQAO arrangements between ARB and SLOCAPCD. The proposed addition is helpful to avoid confusion on the roles of the two organizations and is helpful in putting many of the other addenda in the correct context.

### 1.5 ARB Organization (page 7 of 53)

#### Proposed Modifications:

##### *Proposed Deletion to Section:*

None.

##### *Proposed Addition to Section:*

1.5 San Luis Obispo County Organization

The organizational structure of San Luis Obispo County Air Pollution Control District (SLOCAPCD) includes the following three Divisions:

1. Administration
2. Engineering and Compliance
3. Planning, Monitoring, & Outreach

The Planning, Monitoring, & Outreach Division (PMOD) typically conducts most of SLOCAPCD's air monitoring activities. (Staff from other Divisions are cross trained so they can be utilized to fill in for PMOD staff when monitoring staff are absent). The Planning, Monitoring, & Outreach manager serves as the monitoring manager for the District. Within the Planning, Monitoring, & Outreach Division are two Air Quality Specialists that perform all technical tasks related to air monitoring at SLOCAPCD. The two Air Quality Specialists report directly to the manager of the Division.

Justification for Proposed Modification:

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

### **3.1 Personnel Qualifications (page 18 of 53)**

Proposed Modifications:

*Proposed Deletion to Section:*

None.

*Proposed Addition to Section:*

The SLOCAPCD maintains and periodically reviews detailed job descriptions for each position within the monitoring group. These job descriptions list minimum qualifications that all candidates for hire must meet. The current job descriptions for all positions in the monitoring group are listed below. Job descriptions for the SLOCAPCD are available at:

<http://agency.governmentjobs.com/slocountyca/default.cfm?action=agencyspecs>

Justification for Proposed Modification:

Section 3.1 does not provide details on SLOCAPCD job specifications, so this added information includes personnel qualifications specific to SLOCAPCD.

### **3.3 New Employee Orientation and Training (page 18 of 53)**

Proposed Modifications:

*Proposed Deletion to Section:*

All of Section 3.3

*Proposed Addition to Section:*

3.3 New Employee Orientation and Training

The District provides comprehensive new employee orientation sessions including on the job training from senior program staff, and documents the employee participation and understanding

of pertinent policies and expectations. Additionally, each new staff member will be evaluated at six months and twelve months after initial hire by the PMOD Manager. The District has established written orientation procedures that are located on the District LAN at H:\INFO\Forms\ADMIN\New\_Hire\new\_empl\_orient.doc Records of orientation are kept under control of the Administration Supervisor.

The orientation policy requires that the District makes the effort to hire qualified and experienced monitoring technicians to maintain the level of technical knowledge and maximize the confidence of the data generated, collected and reported. The District utilizes available ARB and EPA training materials and allows staff to participate in learning workshops and technical conferences, including manufacturer's training sessions. The monitoring staff is involved in the CAPCOA monitoring committee and discusses technical and regulatory aspects in order to maintain the District is up to date with changes in the air monitoring activities.

Justification for Proposed Modification:

Section 3.3 is specific to ARB new employee orientation and training. The proposed replacement text provides the policy utilized at the SLOCAPCD.

#### **4.1 Procurement Policy (20 of 53)**

Proposed Modifications:

*Proposed Deletion to Section:*

All of Section 4.1

*Proposed Addition to Section:*

The San Luis Obispo County Purchasing Department is under contract to provide purchasing support for the SLOCAPCD. In general, the District follows the San Luis Obispo County Procurement Policy. The policy is located on the District LAN at: H:\TECH\Budget\Purchasing\_Handbook\_2014.pdf

The purchase of fixed asset items always includes performance and technical specifications, needed to ensure the item meets the needs of the District. Competitive bids are typically required on all fixed asset items. However, the District recognizes the benefit of maintaining similar equipment in their monitoring network, and in cases where the fixed asset purchase will need to conform to the existing equipment utilized in the monitoring program; a sole source justification is provided to the San Luis Obispo County Purchasing Department. The District implements judgement to deviate from guidelines when the purchasing improves the cost saving factors and when it improves or at least maintains the effectiveness of the District's operation. The air monitoring network is designed to maintain its uniformity of operation by integrating equipment of same or similar make and model, thus simplifying the QC protocols and streamlining the work of the monitoring staff.

Justification for Proposed Modification:

The replacement text proposed for Section 4.1 provides the procurement policy utilized by SLOCAPCD.

#### **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:*

(To replace Paragraph 1 of Section 4.4)

Contracts involving SLOCAPCD and an outside contractor are classified as Standard Agreement. These agreements are solicited through a formal, informal competitive bidding process, or sole source contract. Formal competitive bidding is directed by the County Purchasing Department, 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. Whether the contract is formally bid, informally bid or sole source is determined by the SLOCAPCD Executive Officer in conjunction with the San Luis Obispo County Purchasing Department.

Justification for Proposed Modification:

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

**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 initiating the updates to any and all QA/QC documents. Under the guidance and approval of the PMOD Manager, all changes to the air monitoring protocols are performed by the monitoring staff. As pertinent, changes or addendums to ARB or EPA QA/QC protocols will be submitted accordingly 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 SLOCAPCD.

**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 SLOCAPCD Document Retention Policy

The official SLOCAPCD record retention policy specifies that air quality data be retained permanently. For purpose of document retention, SLOCAPCD interprets "air quality data" to 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 and calibration workbooks at their stations for at least the previous three years.

Justification for Proposed Modification:

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

### 6.1 Introduction (page 25 of 53)

Proposed Modifications:

*Proposed Deletion to Section:*

Second Paragraph of Section 6.1

*Proposed Addition to Section:*

(To replace second paragraph of Section 6.1)

SLOCAPCD monitoring staff utilizes two software programs for the collection, manipulation and archiving of the all ambient air monitoring data. AirVision from Agilair Inc. is the primary and active data acquisition and management system. A secondary and inactive system is EDAS, also from Agilair Inc. The primary system is supported by the Agilair and as such all updates and technical support are under paid contract. AirVision has been in place since 2012 and replaced the outdated EDAS software program which is kept only for the purpose of retrieving electronic archived monitoring data from the server. 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 are backed up to on-site secured server(s), 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 SLOCAPCD.

### 6.2 Data Management System (page 25 of 53)

Proposed Modifications:

*Proposed Deletion to Section:*

All of Section 6.2

*Proposed Addition to Section:*

Each monitoring station run by SLOCAPCD has a data logger, and every hour AirVision, the primary data acquisition and management software, polls each data logger in the network and retrieves all

new data since the last successful poll. Currently, all data loggers are Agilaire's (previously manufactured by Environmental Systems Corp.) models 8832 or 8816, but stations can be equipped with various other data loggers that serve the same function. The integration of software and hardware from Agilaire facilitates the interfacing of instruments and minimizes compatibility issues. AirVision data retrieval protocol occurs at least every hour and the software verifies complete data transfer and capture; any detected error in data transmission triggers a subsequent attempt to re-collect data. AirVision has been programmed by air monitoring staff to apply a specific qualifier or null codes (flags) depending on conditions set in the parameter's range and limits. This is a preliminary QA review of the raw data that establishes a continuous consistent evaluation of the data prior to posting for public dissemination.

The AirVision software retrieves the minute data, hourly data, calibration data, and any other pertinent data from the station data loggers and inserts the retrieved data into a Microsoft SQL database. Subsequently all data is reviewed and edited by air monitoring staff. Data is backed up every night to a local server located in the SLOCAPCD building. Data is also backed up on a weekly basis to a Storage Area Network (SAN) in the San Luis Obispo County data center. Backups are stored at an off-site facility for a period of 16 weeks before they are written over. Data is stored on the SQL database server and is never deleted.

At the monitoring site, access to the data loggers is controlled by requiring a user name and password; all modifications to the data loggers is required to be documented into the station's logbooks.

Justification for Proposed Modification:

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

## **6.6 Air Quality System (27 of 53)**

Proposed Modifications:

*Proposed Deletion to Section:*

None

*Proposed Addition to Section:*

The SLOCAPCD 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. 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 SLOCAPCD monitoring staff is responsible for AQS submissions.

## 9.9 Year-End AQS Data Submittal and Summary Report (page 34 of 53)

### Proposed Modifications:

#### *Proposed Deletion to Section:*

None

#### *Proposed Addition to Section:*

Each calendar year, the SLOCAPCD produces an Annual Air Quality Report which is presented to the District's Governing Board. The report summarizes continuous monitoring data submitted to AQS for the prior calendar year as well as trend analysis of historical data going back about ten years. The report includes data from all regulatory air monitoring stations that operate in the San Luis Obispo County, including those operated by the SLOCAPCD 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 and measurement trend analysis for the criteria pollutants. The reports are located on the District website at:  
<http://www.slocleanair.org/air/annualreport.php>

### Justification for Proposed Modification:

The added text for Section 9.9 provides the specifics of the Annual Air Quality Report published by SLOCAPCD staff and presented to the District Governing Board.

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

### Proposed Modifications:

#### *Proposed Deletion to Section:*

None.

#### *Proposed Addition to Section:*

Each calendar year the SLOCAPCD prepares its own Annual Network Plan (ANP) and submits it to EPA for approval. ARB is issued a copy of the annual report for their records. The most current version of this report is publicly available at the District's website:  
<http://slocleanair.org/air/stations.php> Historical reports back to 2009 are archived at the District office.

The SLOCAPCD prepares an Ambient Air Monitoring Network Assessment for San Luis Obispo County every five years, on the same schedule as ARB, and assesses the same factors as described above for ARB's Network Assessment. The most current version of this report is publicly available at the District's website: <http://slocleanair.org/air/stations.php>

### 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 SLOCAPCD in drafting these two reports.

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

#### Proposed Modifications:

*Proposed Deletion to Section:*  
None.

#### *Proposed Addition to Section:*

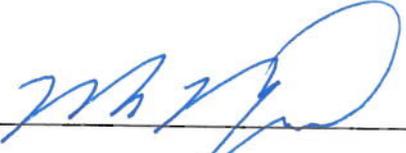
The SLOCAPCD is responsible for submitting ambient air quality data to AQS for the SLAMS monitoring stations it operates. In accordance with 40 CFR, Part 58, Section 15, SLOCAPCD submits an annual data certification letter to U.S. EPA by May 1 of each year. Along with the annual certification letter, the SLOCAPCD also submits AQS reports (i.e., AMP 600 and 450NC) as required by federal regulations. These reports include both criteria and non-criteria data for which the District is certifying. The SLOCAPCD 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 SLOCAPCD is responsible for the annual certification letter and summary report, per the Roles and Responsibilities agreement.

Hereby, the proposed SLOCAPCD addenda to the ARB QMP July 2013 quality control document are submitted for review and approval. Upon signing of this document, the terms and contents within this addendum becomes approved for implementation and therefore applicable to the mutually accepted terms of the ARB-SLOCAPCD PQAO Roles and Responsibility agreement of June 9, 2014.

**CALIFORNIA AIR RESOURCES BOARD**

  
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**Mike Miguel**

Chief Quality Management Branch

Date: 9/21/15

**SAN LUIS OBISPO COUNTY APCD**

  
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**Aeron Arlin-Genet**

Planning, Monitoring and Outreach Division Manager

Date: 21 sept 15

