Message

From: Hamilton, Scott [hamilton.scott@epa.gov]
Sent: 5/11/2017 12:52:34 PM
To: Compher, Michael [compher.michael@epa.gov]
Subject: RE: yesterday Conversation

FYI, I didn't send my edits to Mike (wanted that to go thru you)...

Scott Hamilton
Air Monitoring and Analysis Section
Air and Radiation Division
U.S. Environmental Protection Agency
Phone: 312-353-4775

From: Compher, Michael
Sent: Thursday, May 11, 2017 7:47 AM
To: Papp, Michael <Papp.Michael@epa.gov>
Cc: Qazzaz, Bilal <qazzaz.bilal@epa.gov>; Hamilton, Scott <hamilton.scott@epa.gov>
Subject: RE: yesterday Conversation

Mike - A few suggested edits are included in the attachment. Below is the more lengthy explanation of R5's comments, which are largely captured by your summary. We agree with Scott's edits of your summary. Thanks.

- Compelling evidence should be broadly defined. More examples can be cited, but it should be clear that compelling evidence "includes, but is not limited to" these examples.
- Consider linking "investigative measure", as used in the 1a. Note, to "gathering compelling evidence", as you (M. Papp) explained on our call.
- We recommendation and option to adapt AQS to accept a null check flag showing that a check was performed but deemed by the monitoring organizations to be invalid. This will allow for better Regional oversight, on TSAs and in broader assessments, of the data and data quality.
- This memo should make it clear that *all* valid QC checks *must* be reported to AQS. There should not be monitoring organizations that perform more than the required number (daily, weekly, etc.), but report only a fraction of their valid checks to meet the minimum number/frequency of checks requirement.
- Lastly, I suggest rearranging and rewording the 3rd to last paragraph, as shown in the attachment. This compares the two versions, side by side.

Before

Any routine data represented by a failed 1-point QC check without completing steps 2 and 4 will be identified in EPA quarterly evaluation reports (currently in design phase) and will not be considered valid for regulatory use. EPA Regions will work with monitoring organizations on this data until a resolution of the validity of this data is reached prior to annual certification.

After

Any routine data represented by a failed 1-point QC check reported to AQS without completing steps 2 and 4 will be identified in EPA quarterly evaluation reports (currently in design phase). EPA Regions will work with monitoring organizations on this data until a resolution of the validity of this data is reached prior to annual certification. Data represented by failed 1-point QC checks will not be considered for regulatory use until completion of steps 2-4.

Michael Compher
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Phone: 312-886-5745

From: Papp, Michael
Sent: Thursday, May 11, 2017 6:17 AM
To: Compher, Michael <compher.michael@epa.gov>; Qazzaz, Bilal <qazzaz.bilal@epa.gov>; Hamilton, Scott <hamilton.scott@epa.gov>
Subject: yesterday Conversation

Attached is my small write-up on yesterday's conversation. This is about the length I have for each region. I think you said you would be providing me some edits but let me know what you think and feel free to edit.

R5- 5/10 Compher, Hamilton, Qazzaz

Agree with definition of compelling evidence and agree that some additional examples could be included. If we don't want to report an invalid QC check maybe AQS could add a null qualifier for the 1-point QC transaction. This way the concentration value would not need to be reported but the qualifier could be the placeholder for the invalid QC check. Should also reiterate that all checks need to be reported. Some monitoring orgs are doing additional checks but not reporting them due to resource issue but are now using them as compelling evidence. If they are running the checks they should be reported.

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