Message

From: Papp, Michael [Papp.Michael@epa.gov]
Sent: 4/21/2017 5:16:48 PM
To: Weinstock, Lewis [Weinstock.Lewis@epa.gov]; Judge, Robert [Judge.Robert@epa.gov]; Khan, Mazeeda [Khan.Mazeeda@epa.gov]; Chow, Alice [chow.alice@epa.gov]; Rinck, Todd [Rinck.Todd@epa.gov]; Compher, Michael [compher.michael@epa.gov]; Verhalen, Frances [verhalen.frances@epa.gov]; Davis, Michael [Davis.Michael@epa.gov]; Fallon, Gail [fallon.gail@epa.gov]; Flagg, MichaelA [Flagg.MichaelA@epa.gov]; Hall, Chris [Hall.Christopher@epa.gov]
CC: Payton, Richard [Payton.Richard@epa.gov]; Brown, Ethan [Brown.Ethan@epa.gov]; Wells, Benjamin [Wells.Benjamin@epa.gov]; Naess, Liz [Naess.Liz@epa.gov]; Rice, Joann [Rice.Joann@epa.gov]; Lau, Gavin [Lau.Gavin@epa.gov]; Sather, Mark [sather.mark@epa.gov]
Subject: RE: URGENT ACTION – Invalidation of Ozone data in AQS due to QC issues-
Attachments: Steps to accept data not meeting critical criteria.docx

Yesterday Lew Weinstock, Liz Naess and I presented the OIG issues on the NACAA call. We had some push back on the call but I thought Lew did a great job of making the monitoring organizations understand the issue. During the call there was a discussion of how to validate some data in which a check failed but the monitoring organization went out and did some "as is" QC check or multi-point verification which proved that the analyzer was operating properly. I mentioned on the call that I had started developing a flagging technique that I initially thought would be something that we would start implementing after we got through this current validation process but it sounded like it might be helpful now for those that might want to use it. The document is attached.

The difference in this procedure is now it seems prudent to allow failed 1-point QC checks to be reported to AQS. This is reversal on my past position that the checks should not be included if the data is also invalidated but we can make AQS disregard these points for assessments with the correct flagging technique while still reporting them.

Please let me know you what you think about the approach. I ran this past Robert Coats and it's doable. I think minimally if some Regions felt they could use it, the data flagged as "V1" by the monitoring orgs would have to have compelling reason documented and concurred with by the Region through either and email or formal memo back to the Regions and archived here. Region 6 received a formal letter by ODEQ which showed what data they would invalidate and where they had a compelling reason to keep the data. Until we had the full system in AQS working, where you could concur with the AQS data, this would seem acceptable to us.

We may want to have a quick call conference call with the Regions on this technique.

Please send any comment to Lew and I ASAP. If we find this acceptable we could get this out to the monitoring orgs ASAP since they were interested in seeing it.

Thanks and have a good weekend

-----Original Message-----
From: Weinstock, Lewis
Sent: Thursday, April 13, 2017 8:44 AM
To: Judge, Robert <Judge.Robert@epa.gov>; Khan, Mazeeda <Khan.Mazeeda@epa.gov>; Chow, Alice <chow.alice@epa.gov>; Rinck, Todd <Rinck.Todd@epa.gov>; Compher, Michael <compher.michael@epa.gov>; Verhalen, Frances <verhalen.frances@epa.gov>; Davis, Michael <Davis.Michael@epa.gov>; Fallon, Gail <fallon.gail@epa.gov>; Flagg, MichaelA <Flagg.MichaelA@epa.gov>; Hall, Chris <Hall.Christopher@epa.gov>
Cc: Payton, Richard <Payton.Richard@epa.gov>; Brown, Ethan <Brown.Ethan@epa.gov>; Papp, Michael

<Papp.Michael@epa.gov>; Wells, Benjamin <Wells.Benjamin@epa.gov>; Naess, Liz <Naess.Liz@epa.gov>; Rice, Joann <Rice.Joann@epa.gov>
Subject: URGENT ACTION – Invalidation of Ozone data in AQS due to QC issues
Importance: High

Good morning:

As you all are aware by now, we have recently identified ambient ozone data in AQS that was reported during periods of time when 1-point QC checks were outside the critical criteria in the QA Handbook and contained in approved monitoring organization QAPP's. We are currently in the middle of the ozone designations process and it is important that we maintain the integrity of that process. It is critical that we base our designations decisions on defensible data for areas both attaining and not attaining the standard. To this end, we believe that the data identified as outside these critical criteria be null coded in AQS so that the underlying design values supporting the designations process are based on valid data. We understand that there is limited time to complete this work due to the tight timelines for designations. Therefore, this process has been divided into two phases as explained below:

Phase 1:
These are high priority monitors whose 2014-2016 design value would change or become incomplete due to the data invalidations. Attached to this message is an Excel table that explicitly lists the monitors and periods of time for when ozone data should be null coded (coded as Phase 1). We ask that you communicate with the affected monitoring organizations to ensure that these data are invalidated in AQS no later than May 1, 2017 (we will be doing our design value pull from AQS on the morning of May 2). Luckily this first phase only affects about 80 monitors, as some states have already begun invalidating their data.

Phase 2:
The list of the remaining monitors that will have similar data invalidation actions are coded as Phase 2 in the Excel table. These monitors have a less immediate impact on designations so are being included in the Phase 2 action. We recognize that this phase affects a larger number of monitors, therefore we are providing more time to invalidate this data. Please work with your monitoring organizations to complete this exercise by August 1, 2017.

Additional details on the Excel table: The attachment contains three tabs: (1) Data Invalidations – which contains specific information for the data invalidation, (2) 2014-2016 Design Values – design values before and after ("a" added to column heading) data invalidations, and (3) Failed QC Checks – details on the actual QC checks. Please contact Liz Naess (Ben Wells is out of the office until 4/24/17) or Mike Papp with questions on the data retrieval (Liz/Ben) or associated QA issues (Mike).

For additional background information on this quality assurance issue, please refer to the attached memo entitled "Ozone 1-point QC Check Data Quality Evaluation and Next Steps".

We will be checking in periodically during our monthly conference calls to answer any questions and assess progress on this action. Thank you for your prompt attention to this matter.

Lewis Weinstock (Ambient Air Monitoring Group and Liz Naess (Air Quality Analysis Group)

Air Quality Assessment Division - Mail Code C304-06 | Office of Air Quality Planning & Standards | U.S. Environmental Protection Agency | Research Triangle Park, NC 27711 |