UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103

US Environmental Protection Agency (EPA) Region 3 and Pennsylvania Department of Environmental Protection ~~Agency~~ (PADEP) comments for MarkWest Harmon Creek Processing Plant VOC QAPP related to the MarkWest Consent Decree (no. 2:18-cv-00520-LPL)
All comments were developed by:
Region 3 Office of Air Monitoring and Analysis (OAMA)
Region 3 Office Air Enforcement and Compliance Assurance (OAECA)
PADEP - Quality Assurance and Data Assessment Section

Element	Element No.	Page	Comment
Overall/General Comments	n/a	n/a	This QAPP needs to include PADEP participation in this Supplemental Environment Project. Furthermore, all quarterly submissions must be sent to PADEP and the final report must be sent to EPA and PADEP. Please proof read and make corrections where words are misspelled/inaccurate, and where paragraphs are duplicated. MarkWest must identify who is the PQAO for this project. Please reference the QAPP review checklist to insure all necessary information is included. The checklist can be found on EPA's website [HYPERLINK "https://www3.epa.gov/ttn/amtic/qalist.html"] along with the *Guide to Writing Quality Assurance Project Plans*. Addresses Final Report in the redrafted QAPP. The final report must include interpretation and analysis of the data. Improvement of the objectives of this monitoring SEP is highly recommended.

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Element	Element No.	Page	Comment
Approval Signatures	A.1	A-1	Signature lines needed for PADEP QAPP reviewer(s). EPA lines should be for Technical Lead, QA Coordinator and Enforcement Lead. Please include a statement that commits all responsible parties to adherence to the QAPP.
Distribution List	A.3	A-7	Add EPA and PADEP contacts to the distribution list. EPA contacts: Kia Long (QA Coordinator), Verena Joerger (QA Coordinator), Lori Hyden (Monitoring Technical Lead), and Natalia Vazquez (EPA R3 Enforcement lead for this Consent Decree). PADEP contacts: have PADEP include necessary names.
Distribution of the QAPP			Please add this QAPP will be distributed electronically to EPA (i.e., email or CDX) and PADEP (i.e., email) and a hardcopy backup will be provided to PADEP
Project/Task Organization	A.4.3 A.4.4	A-9	*"EPA Region 3 will assign an ambient project manager who will provide project oversight. EPA Region 3 will assign a Quality Assurance Coordinator who will direct all quality assurance activities as related to the air toxics and meteorological monitoring program at the Harmon Creek Gas Processing Plant."* Region 3 believes these roles and responsibilities belong to MarkWest QA and MarkWest Project Manager. Per the Consent Decree (CD), EPA Region 3 OAMA will be responsible for reviewing and approving the quality assurance planning documents (i.e., QAPP and Monitoring Plan). MarkWest should provide a Project Manager for project oversight and QA Coordinator to direct all quality assurance activities related to the Supplemental Environmental Project (SEP). EPA Region 3 and PADEP will not provide a project manager for this project.
Project/Task Organization	A.4.10	A-11	Indicate who will act as the independent auditor. If unknown right now, consider listing examples of potential auditors. For example, sub-contractors of MSI Trinity
Project/Task Organization	Figure A.1	A-12	Revise the organizational chart based on comments made above relating to sections A.4.3 and A.4.4. The organizational chart should illustrate the lines of communication between the key players directly involved in this SEP.

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Problem Definition/Background	A.5	A-12	*"Pursuant to Section VI of the Consent Decree, a fenceline monitoring system (FLMS) will be installed, operated, and maintained at the Harmon Creek Facility to measure ambient concentrations of propane, butane, pentane, hexane, benzene, toluene, ethylbenzene, xylene and all of its isomers, and total VOC's".* This list of compounds is not inclusive of all the compounds listed in Table A of the CD Appendix 8 #16.
Problem Definition/Background	A.5	A-13	*"The information collected for this monitoring program will meet the requirements as found in the following documents".* Add NATTS TAD to the list of documents.
Problem Definition/Background	A.5		Climate and topography is stated but the problem is not clearly defined. What is the anticipated time frame to begin sampling? How much data is required to complete the project? What happens if acceptable data falls below the anticipated 85% completion mark? Will the project be extended beyond the minimum 720 days as specified in the CD? These are questions that need to be addressed.
Project/Task Description	A.6	A-14	*Table 3 Harmon Creek Meterological and Air Quality Monitoring Equipment* The units/range of measure for air toxics section is confusing. Please clarify the detection range for all compounds (Table A of the CD Appendix 8). Include the Auto Gas Chromatography manufacturing specifications and parameters with the units specified in the CD Appendix 8, whenever possible.
Project/Task Description	A.6.2	A-23	This section should include that monitoring will be for a period of at least seven hundred twenty (720) days as required by the Consent Decree (CD).
Project/Task Description	A.6.2	A-23	*"...quarterly data summaries within 60 days..."* CD requires quarterly reports to be submitted within 45 days not 60 days. CD Appendix 8, Section C #16

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Project Reports	Table A-5	A-24	Table A-4, the project Schedule does not appear to be a complete schedule of the project but describes only the operations portion. Please include a timeline from start to finish. The first row in Table A-5, under the Content column states, *"Summarize data following EPA guidelines"*. Data summaries must be according to Appendix 8, Section C, #16 of the CD. Also, this table is missing the Final Report that is required by the CD.
Quality Objectives and Criteria for Measurement of Data	Table A-6	A-26	*"EPA will use data to determine fence line air toxics concentrations around the Harmon Creek processing facility"*. If MarkWest (or MSI Trinity) is performing the monitoring and compiling the data reports, then they will be responsible for determining fence line air toxics concentrations around the facility, not EPA. Table A-6 references sections A.6.3 and A.6.2 but these sections do not discuss the sampling frequencies or the sampling locations. Please reference the correct sections.
Quality Objectives and Criteria for Measurement of Data	A.7	A-26	*"The general air toxic project objectives are to: (1) provide measurements of selected pollutants to be used in evaluating population exposure to these pollutants, and (2) provide a speciated database that is both* *representative and useful for ascertaining ambient profiles and distinguishing among various individual VOCs."* General project objectives should be avoided in project/site specific QAPPs. How will population exposure be evaluated and by whom? The CD doesn't discuss analysis or assessments of exposure from the monitoring data collected. Project goals should be consistent with the CD.

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Special Training/Certifications	A.8	A-29	*"MarkWest personnel ensure that monitoring is performed according to Consent Decree and EPA regulatory requirements by contractors that are experienced and knowledgeable".* There are no regulatory monitoring requirements for air toxics. Reword "EPA regulatory requirements" to "EPA guidance". Page A-29 states the "Siloam" monitoring stations, please use the correct monitoring stations. Also, please correct the spelling in the second to last line in this section, "presentative".
Documents and Records	A.9	A-30	How are the field maintenance records handled? Are they electronic or are they kept in the field logbook? Final report is missing from Table 12
Documents and Records	A.9	A-31	*"Quarterly data reports will be compiled by MSI Trinity and submitted to the MarkWest no later than sixty (60) days after the end of each quarter".* Specify whether EPA and PADEP will receive these quarterly reports and how they will be sent (i.e., email). A column could also be added to Table A-5 that would indicate the report file format (i.e., .txt, .csv, etc.). In addition, the CD requires quarterly reports to be submitted within 45 days not 60 days. CD Appendix 8, Section C #16
Sampling Process Design	B.1	B-1	*The monitoring methods and equipment implemented provide SPM quality air quality and meteorological data that can be used to insure compliance with the National Ambient Air Quality Standards (NAAQS)".* There are no NAAQS for air toxics, and this project does not take place at a NAAQS monitoring site.
Sampling Process Design	B.1	B-1	This section should include that monitoring stations should not be moved to a new location without prior written approval by EPA, following consultation with PADEP. CD Appendix 8, Section B #11.
Sampling Process Design	B.1		In addition to 40 C.F.R. Part 58, Appendix E, which is used for siting NAAQS pollutants, the CD states compliance with the NATTS guidance document. Please include that reference in the QAPP. Please remove duplicate lines.

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Sampling Process Design	B.2	B-3	Please clarify the end of the first sentence on page B-3 "… and remotely". Please clarify the paragraph that states the detection range for the compounds. The wording is confusing.
Monitoring Equipment and Methods Description	B.2.1.1	B-3	Teflon is not recommended for any surface that comes in contact with the air sample. *"All wetted sampling surfaces that contact the sampled atmosphere, including the inlet probe, must be of chromatographic grade stainless steel or borosilicate glass... While PTFE Teflon is permitted, its use is not recommended as high molecular weight compounds may adsorb to the surface."* - NATTS TAD Revision 3 Section 4.2.1.1
Standard Operating Procedures	B.5	B2.3	Please correct the Appendices where SOPs are located. If not in this subsection please make this correction in Section B.4 Analytical Methods.
Quality Control Requirements	B.5	B-6	*"valid data recovery meets or exceeds the 75% data completeness requirement"* This statement is contradictory. The QAPP establishes 85% data completeness in sections A.7, A.7.2 and D.1.5 and Table A-7.
Site Surveillance and System Check Procedures	B.6.2	B-11	First sentence says site technician will visit the site monthly while Section B.5.1 says visits will be weekly. Please clarify and correct.
Quality Control Requirements	Table B-7	B-11	Include reference to calibration criteria in table.
Calibration Forms	B.7.3	B-15	Please verify and correct Appendices referenced.
Data Management	B.10	B-16	*"The quarterly reports will conform to EPA guidance"*. Instead of "EPA guidance", cite quarterly report contents to be discussed in the Documents and Records section of this QAPP. Quarterly reports must, at a minimum, contain the elements discussed in Appendix A, Section C #16 of the CD. Please add a line that states how long electronic copies of the data will be kept.

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Data Management	B.10.9	B-18	While it is okay to flag data from days where unusual events occurred, this is not NAAQS monitoring, so the EPA exceptional events definition and process for exclusion of data do not apply.
Assessments and Response Actions	C.1	C-1	Who is the independent auditor? This needs to be addressed before the project begins.
Reports to Management	Table C.1	C-2	*"17. Final Report. Within 90 days of the conclusion of the monitoring period, MarkWest shall prepare and submit a Final Report."* CD Appendix 8, Section C, #17. Table C-1 doesn't include the final report due 90 days after monitoring is concluded.
Reports to Management	C.2	C-2	*"The Final Report shall describe the Harmon Creek Monitoring System sampling, compile all data collected, including meteorology, chemical compounds, and QA/QC, and interpret and analyze the data collected by the Harmon Creek Monitoring System."* Explain in detail how MarkWest will "interpret and analyze the data" to meet project objectives and fulfill the requirements of the Final Report. In the Consent Decree, Requirement 17 is a Final Report. Please add the final report to the list.
Data Review, Validation, and Verification Requirements	D.1	D-1	The first paragraph on D-1 should also refer to the NATTS TAD.
Level 0 Data Validation	D.1.2	D-2	The 2nd bullet references Section D.2.2. That section does not exist. Please correct. Is MSI Trinity's QC software validated? If so, how and by whom?
Quality Control Checks for Data Validation	D.1.3	D-4	What defines "large" when looking at jumps or dips in concentrations? This needs to be defined.