

## AQS Data Certification Q & A Webinar 2020

Instead of hosting the typical webinar where we go through the data certification, which most agencies have already done repeatedly in the past, we thought it would be more beneficial to have a Q&A session. The Ambient Air Monitoring Data Certification Q&A for CY2019, the Guidance on the Data Certification Process for CY2019 AQS Data, and the Data Certification Flag Values have all been posted to the [Data Certification/Validation webpage](#) on the AMTIC Quality Assurance site. AQS trainings and webinars have been posted on the [AQS Training webpage](#) and the certification flags can be found in the [AQS Code List](#).

1. Is there any technical guidance for how to get AQS access from a home laptop?

**A:** In order for AQS to run, the device being used would need to have an internet connection and the Java application installed.

2. Are the data certification due dates going to be postponed?

**A:** No. All data certifications for the 2019 data and any data from other years that have been altered need to be submitted by May 1<sup>st</sup>.

3. What type of signatures will be accepted for the letter and AMP600 since everyone is teleworking and everything is electronic?

**A:** Two methods are suggested for the signatures. Electronic signature via PDF on both the letter and AMP600 is one alternative. Adobe Acrobat has a fill and sign tool that will allow individuals to electronically sign pdf documents. Another alternative would be an email from the monitoring agency's head official, or his or her designee, where they clearly state that they are signing the attached certification letter and AMP600. For information on how the package needs to be submitted either electronic, hard copy, or both please contact your EPA regional office.

4. What do we do if we are unable to perform data validation or submit data to AQS?

**A:** Provided the user has an internet connection and a computer that has Java, the user will be able to access the AQS application. To submit data to AQS, the user will need to be able to get their data from their own agency facilities. They will also need to be able to access their agency's node on the Exchange Network or access the ENSC.

If you are having issues validating data or loading data in AQS, please notify your EPA regional office contact and describe what difficulties are preventing the validation or submittal of data and which data will be impacted (sites, monitors, pollutants, dates, etc.)

5. For our trace level CO monitor, we did a one-point quality checks for the entire year. For the first half of the year, we did them at values below the required range, so they did not get counted. We would still like to certify the data. Do you have a suggested comment to enter, so the data will get certified?

**A:** Just a reminder to everyone, the AQS acceptable 1-pt QC ranges for the gaseous pollutants are: Ozone: 0.005 - 0.080 PPM (5-80 PPB), SO<sub>2</sub>: 5.0 - 80.0 PPB (0.005-0.08 PPM), NO<sub>2</sub>: 5.0 - 80.0 PPB (0.005-0.08 PPM), and CO: 0.5 - 5.0 PPM (500 -5000 PPB). This information was also made available in the QA EYE Newsletter Issues 23 and 24. You must perform a check within these level ranges. You can also choose to do an additional check at a lower concentration.

For the certification I personally would enter a comment stating that the required 1-pt QC checks were performed and entered into AQS but were not counted since they were outside of the acceptable ranges in AQS. If the 1-pt QC checks outside the acceptable range did pass, please include that in the statement. Therefore, your agency deems the data to be valid. You may also want to include a statement as to why you originally choose these lower 1-pt QC ranges as further justification. I would highly suggest you speak with your regional office data certification contact to discuss any further justifications or actions they may need.

6. In the “Guidance on the Data Certification Process for Calendar Year 2019 AQS Data”, Attachment 1, will any of the green shaded rows not implemented for 2019 data certification be implemented for 2020 data certification? Are there any other changes that will be implemented for 2020?

**A:** The green shaded rows include outliers for all pollutants, PM<sub>2.5</sub> flow rate verification completeness and bias, PM<sub>10</sub> continuous flow rate verification completeness and bias, PM<sub>10</sub> manual flow rate verification completeness and bias and Pb TSP manual flow rate verification completeness and bias. OAQPS and the EPA Regional Offices are discussing possible changes needed to data certification and the AMP600. Our first meeting is scheduled for later this month. At this time, we have not determined that any changes need to be made. If it is decided that changes are needed, we are hoping to work with the AQS Team and the Regional Offices to determine whether they can be implemented how long it will take to do so. We will notify everyone as soon as possible in order to avoid last-minute surprises and enough time for our certifying agencies to prepare.

7. Industrial monitors: The data certification Q&A document includes a footnote on page 2 “Data certification requirements may also be included in auxiliary agreements such as MOA’s between states and operators of industrial networks, for example, SO<sub>2</sub> monitors being installed to comply with the Data Requirements Rule.” Is an auxiliary agreement with data certification requirement a prerequisite to concurring on a requested data certification for industrial monitors? If so, the assumption is that the agreement would

be submitted with the data certification request? If an auxiliary agreement with data certification requirement doesn't exist yet the state requests concurrence on certified industrial data, should the region concur?

**A:** Yes, we are assuming if someone other than the industry is certifying the industry monitor data that there is some sort of agreement in place. I don't think it is necessary to submit the agreement with the data certification unless you would like to have it on record that the certifying agency does indeed have the authority to certify the data for the industry monitor. An agency cannot certify data that it hasn't collected or been authorized to certify. If an industry has not granted authority to an agency to certify their data, then the industry is responsible for certifying their monitor's data. This should be reflected in the AQS agency roles for that monitor (i.e. who is PQAQO, who is the auditing agency, who is the certifying agency, etc.).

A lot of this depends on who is identified as the certifying agency in AQS for an industrial monitor. If the industry is down as its own PQAQO and certifying agency, then they must be the ones to submit a data certification. If they have an agreement with a S/L/T or other PQAQO to be the certifying agency, then that agency can certify the data for the industrial monitor. We are assuming that if an agency, other than the industry who owns and operates the monitor, has some sort of agreement in place that states the agency is authorized to certify the industry data.

8. I understand that 5-minute SO<sub>2</sub> data must be uploaded into AQS and an AMP450NC submitted as part of a data certification to demonstrate the data is uploaded. Is the state required to certify SO<sub>2</sub> 5-minute data and if so, should the region concur on it?

**A:** When an agency submits the AMP450NC with 5-min SO<sub>2</sub> (parameter code 42401 or 42406) as part of the certification package, that is the agency certifying the data. At that point the data is certified. For the 42401 data the state and region can choose to enter AQS certification flags, but the 5-min SO<sub>2</sub> data will not appear in the AMP600. The flags for the 5-min SO<sub>2</sub> data will not appear in any of the AQS reports. So, it is not necessary to enter flags for 5-min SO<sub>2</sub>.

9. We are certifying in AQS we have an approved QAPP. Entering flags electronically but there is no column to enter flags for the data. Area is grayed. Suggestions?

**A:** The EPA regional office can enter the approved dates for the QAPP in AQS. However, having an expired QAPP date in AQS will not prevent the entering of data certification flags. First, make sure a certifying agency has been designated for the monitor in AQS. Also, make sure you have logged into AQS under the appropriate screening group. If this does not resolve the issue, please submit a ticket through the EPA Enterprise IT Service Desk (EISD) at [EISD@epa.gov](mailto:EISD@epa.gov) or 1-866-411-4372.

10. I have two PM monitors that are not showing up on the 600 Report. We switched which POC was the primary monitor and set end/start dates but they're not showing up.

**A:** First, please ensure that both monitors (both POCs) have certifying agencies identified. You can check the AQS maintain monitor form to verify or enter a certification agency role for the monitor. Also, please be aware that only criteria pollutant monitors will appear in the AMP600. If this does not resolve the issue or answer your question please submit a ticket through the EPA Enterprise IT Service Desk (EISD) at [EISD@epa.gov](mailto:EISD@epa.gov) or 1-866-411-4372.

11. I'm having an issue with the PM2.5 section of the AMP600. I have an API T640X Method code 238 that shows up shaded in red. Is the reason why because of 40 CFR Part 58 3.2.3.2 b? I interpreted that since it's the first monitor being collected, it has to be first collocated with a FRM at the same site (In our case a 2025).

**A:** Yes, your monitors need to meet the collocation requirements in 40 CFR Part 58 Appendix A Section 3.2.3.2. This states that for each primary FEM, 50% of the monitors, or the first if only one collocation is needed, needs to be collocated with an FRM. If this method for PM2.5 is not meeting collocation requirement, the AMP600 will flag all monitors under this method with a red flag. A T640x is allowed as a primary monitor, it would simply need to meet collocation requirements.

Also, please ensure your monitor is identified as a primary monitor, AQS will assume the lowest numbered POC is the primary if not designated, in the Primary Monitor Periods tab on the Maintain site screen with the date it became the primary monitor. You can contact EISD at [EISD@epa.gov](mailto:EISD@epa.gov) or 1-866-411-4372 for instructions on how to set primary and collocated monitors.

12. I'm receiving a "More than one RCF defined for this date" error. The site in question had two POCs (1 & 2) with hi-vol wedding inlets. POC-1 was primary and POC-2 was QA collocated. The hi-vols ended on 11/4/2019 with one continuous TEOM starting for only POC-1 in 11/5/2019. Unfortunately, I'm off by one date in AQS and can't change the dates to match what happened in the real world. Is there an idea on how to fix this?

**A:** There is a way this can be corrected. Please enter a ticket through the EPA Enterprise IT Service Desk (EISD) at [EISD@epa.gov](mailto:EISD@epa.gov) or 1-866-411-4372 and we can walk you through correcting this issue.

13. Will the AMP600 tag incomplete Flow Rate Verifications for ALL PM samplers?

**A:** At this time no. The AMP600 for the 2019 data will not be including the flow rate verifications for PM or Pb. However, flow rate verifications are still required to be collected on a per monitor basis and reported to AQS in accordance with 40 CFR Part 58 Appendix A.

14. Does the 450NC need to be signed like the AMP600?

**A:** No, the AMP450NC is not required to be signed. Signatures are only needed on the certification letter(s) and the AMP600(s). The AMP450NC is considered signed when it is submitted as part of the certification package under the signed certification letter.

15. Did you say everything can be submitted electronically and we do not need to submit a hard-copy?

**A:** The signatures can be submitted electronically. Please see the earlier question. Please contact your EPA regional office on their preferred submittal format for your data certification submittal. Some regions allow for electronic submittals, some require hard-copy submittals, and some prefer to receive both. Again, please work with your regional office on the submittal of your certification packages.

16. Do you have to certify data from a monitor that was shut down 3/4 way through the year?

**A:** Yes, you need to certify any data that was collected in 2019 and reported to AQS, as outlined in 40 CFR Part 58.15. This means that even if your monitor collected data only on January 1, 2019 and was shut down on January 2, 2019, the data needs to be certified.

17. Our PM10 metals collocated sampler does minimal sampling (every other month) for NATTS. Is there a recommended frequency that will allow the completeness to appear correctly in the AMP430 and AMP600 for PM10?

**A:** If the site is being used for NAAQS comparison it will have to conform to the NAAQS. If you have issues setting the correct frequency in AQS please contact the EPA Enterprise IT Service Desk (EISD) at [EISD@epa.gov](mailto:EISD@epa.gov) or 1-866-411-4372.

18. Is there a document that summarizes what the criteria are for the Y/N flags in the AMP 256 and for the yellow and red highlights in the AMP600?

**A:** The criteria used for the 2019 data can be found in Attachment 1 of the [Guidance on the Data Certification Process for Calendar Year 2019 AQS Data](#) document, which has been posted under data certification/validation on the AMTIC Quality Assurance webpage.

19. Starting April 2016 all Flow Rate Verifications are required to be in AQS for all PM samplers. AMP600 has not tracked incomplete submittals. Did it change?

**A:** You are correct that all flow rate verifications are required to be entered into AQS for all PM and Pb monitors in accordance with 40 CFR Part 58 Appendix A. The AMP600 for the 2019 data will not be including or tracking the flow rate verifications for PM or Pb.

20. Is this all on the monitor level? Does it have to also be on the site level?

**A:** When we discuss sites, this could mean multiple criteria pollutants being monitored at any one site. A monitor is a single pollutant instrument at a site. The AMP600 breaks down an agency's criteria pollutant network by pollutant and then by monitor (POC). However, the AMP600 does look at some criteria that could affect all monitors under a criteria pollutant (i.e. collocation, QAPPs, etc.)

21. In the AMP504 the 1-pt QC checks are showing at 100% but in the AMP600 it shows they are below 60%.

**A:** Please work with your AQS regional contact. If you are still having issues, please submit a ticket to the EPA Enterprise IT Service Desk (EISD) at [EISD@epa.gov](mailto:EISD@epa.gov) or 1-866-411-4372.

22. Is there any progress in AQS improvements (reports, 2016 exceptional events rule, etc.)?

**A:** EPA is looking at Oracle Business Intelligence. We have had no contractor support for the past few years. Once a contractor is added, EPA will implement exceptional event rule updates.

23. Our T640 does not match our filter data in 2019 (outside the "Part 53 box") Please explain how to disqualify the data for NAAQS comparisons.

**A:** Please work with your EPA regional office to discuss the most appropriate actions to take. An assessment identifying why the data should not be compared to the NAAQS may need to be submitted to the regional office in accordance with 40 CFR Part 58 and approved by the Regional Administrator. An assessment tool: [Instructions and Template for Requesting that data from PM2.5 Continuous FEMs are not compared to the NAAQS](#) is available on AMTIC.

However, just because you find out at the end of the year that you have a high CV (or you are outside the box), is not a reason to retroactively go back and call data invalid or not comparable to the NAAQS. Please note any re-coding from 88101 to 88502 or requesting to be not compared to the NAAQS should be requested and approved through the Annual Network Plan (40 CFR Part 58.10(b)(13))

24. We cannot match the CVs for collocated PM10 that appear in the AMP600. Do you anticipate changing the AMP600 PM10 CV calculation before May 1?

**A:** No, the PM10 CV calculation will not be changed before May 1.

25. In preparation of impending storms, such as hurricanes, we shut down and store our equipment to keep it from getting damaged. How will this affect our certifications.

**A:** We know in situations like this it is important to protect the equipment, and to do so, it has to be shut down and moved to a safer location. When performing calculation for things like data completeness, QC completeness and sometime audit completeness, the AMP600 does take the end dates and start dates into consideration. It only uses the dates the monitor was in operation.

26. On this note, if sites stopped for Coronavirus reasons, would that same advice apply (the advice about adding stop dates, like the hurricanes question)?

**A:** No. Please work with your regional office who can provide you with guidance regarding this question. However, we are asking agencies not to enter end dates in AQS for their monitors due to COVID.

27. Is it true that the EPA will only use data which have been certified?

**A:** No, this is not true. The monitoring agencies do not have the ability to preclude EPA from using NAAQS exceedance and violation data simply because they do not certify this data. 40 CFR Part 50, Appendix N (for PM2.5) says, "Generally, EPA will only use such data if they have been certified by the reporting organization (as prescribed by §58.15 of this chapter); however, data not certified by the reporting organization can nevertheless be used, if the deadline for certification has passed and EPA judges the data to be complete and accurate."

In practice, for recent PM2.5 and ozone designations, we have not used the lack of certification as a reason to not use violating data in the designation. After reviewing the raw data and QA data, we can use it.

28. Why are 1-pt QC checks not showing up in the AMP600 for SO2 data?

**A:** It could be a number of reasons. Please work with your regional office to determine the issue. If you are unable to resolve the issue, please submit a ticket to the EPA Enterprise IT Service Desk (EISD) at [EISD@epa.gov](mailto:EISD@epa.gov) or 1-866-411-4372

29. How do we flag missing data due to COVID-19?

**A:** We are asking agencies to work with their regional offices who can provide guidance regarding this question. However, we are asking agencies not to enter end dates in AQS for their monitors due to COVID. We understand everyone's concerns for the

2020 data and the certifications. Please note that even though null codes will affect the AMP600, the agency and EPA can choose to enter flags other than the AQS flags and add supporting comments in the data certification form. We are asking everyone to work closely with their regional offices, who are working closely with OAQPS, in order to appropriately handle the 2020 raw data and QA/QC being affected.