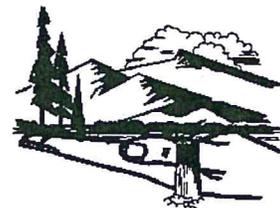




# Department of Environmental Quality

*To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.*



Matthew H. Mead, Governor

Todd Parfitt, Director

December 22, 2015

Industrial Facilities with Ambient Monitoring

## **RE: IMPACT Transition, Quarterly Reports, and QAPPs**

This letter is to inform you of the Air Quality Division (AQD) Monitoring Section's transition to using the online IMPACT system for future document upload, as well as to clarify what is expected to be included in future Quarterly Ambient Monitoring Report submittals and Quality Assurance Project Plans.

### **IMPACT Transition**

In 2014, the Wyoming Department of Environmental Quality – Air Quality Division (AQD) went live with the new online Inventory, Monitoring, Permitting, And Compliance Tracking (IMPACT) data system. The Monitoring Section has been working over the past several months to develop the Monitoring Module in IMPACT that will allow quarterly ambient monitoring submittals through the IMPACT portal.

Beginning with the first quarter 2016 ambient monitoring data submittal (due May 30, 2016), the Monitoring Section will transition to the exclusive use of IMPACT for quarterly submittals, rather than the current AQD File Upload Utility. Therefore, your facility must use IMPACT to submit quarterly reports and data for required ambient monitoring. The Monitoring Section also prefers other types of ambient monitoring submittals through IMPACT, such as Annual Network Justifications, Network Modification Requests, and SO<sub>2</sub> Data Requirements Rule submissions.

There are several benefits to transitioning to the IMPACT system for ambient monitoring uploads. First, the IMPACT system will allow for entirely paperless ambient monitoring related submittals to the AQD. Specifically, Title V sources will no longer have to send in a separate paper certification signed by a Responsible Official, this can be accomplished though e-signing. Second, the IMPACT system is more reliable and has the technological support needed for reliable uploading and tracking of submissions. Last, ambient monitoring documents and coding will be readily available to the facility allowing more transparent information sharing between the Monitoring Section and facilities. Additionally, as with other AQD processes in IMPACT, industry can allow their monitoring contractors access to their facilities in IMPACT through the affidavit process, if desired.

In the first quarter of 2016, the AQD will send out notifications on training opportunities for the IMPACT system and Monitoring Module. Please contact your Monitoring Project Manager or the IMPACT Project Team ([deq-air-impact@wyo.gov](mailto:deq-air-impact@wyo.gov)) for more details and support during this transition.

**Quarterly Reports**

The AQD is aware that there is a lot of variation in how quarterly ambient monitoring reports are prepared. This variation reflects the diversity of facilities, parameters measured, and contractors used across the statewide industrial ambient monitoring network. However, there are certain components that the AQD considers critical to include in quarterly reports in order to verify that ambient data at a facility was collected and validated per each facility’s permit(s), QAPP, and EPA Quality Assurance requirements. Therefore, the AQD is offering this list of report components for facilities to use when putting together future quarterly report submittals.

Please note that not every element will be applicable or necessary in every situation. However, every quarterly report should include at a minimum a Network Description, an Overview of Network Operations during the quarter, a Monitoring Data Summary, a Summary of QA/QC Data, Complete Collected Validated Air Quality Data in the applicable standard form, and Raw and QA Data in AQS format for upload. These required components, and examples of elements, are listed below:

<b>Required Component</b>	<b>Example Content</b>
1. Network Description	Overview of Network Locations Monitoring Equipment Descriptions AQS Coding to POC Level for each Station/Parameter etc.
2. Overview of Network Operations	Narrative of Site Visits Corrective Actions Performed Invalidated Periods with Explanations Network Modifications etc.
3. Monitoring Data Summary	Quarterly Mean/Max Values Year-to-Date Mean/Max Values Exceedances Data Completeness Meteorological Data Summary Wind Roses etc.
4. QA/QC Data Summary	Precision Results Flow Verifications Performance Evaluation Audits Calibrations Calibration Standard Certification etc.
5. Validated Air Quality Data	Daily Averages/Concentrations (or applicable standard form) in Excel file or included in report
6. AQS Data	All Validated Data in AQS Format

**QAPPs**

The Quality Assurance Project Plan is a formal document describing in detail, the necessary QA/QC and other technical activities that must be implemented to ensure that the results of air quality data collected will satisfy performance criteria, and the data quality objectives. The QAPP is reviewed according to an EPA checklist of required and suggested elements. Please contact the Monitoring Section Quality Assurance Coordinator, Steve Mugg (steven.mugg@wyo.gov), for a copy of the checklist.

WDEQ-AQD requires monitoring organizations to write, submit, and upload a QAPP every five years. Once the QAPP is written and approved, it is expected to be reviewed annually or when a change is made to the monitoring network. AQD requests an annual letter which discusses the need for changes or corrections. If corrections are necessary submission of the appropriate pages through the IMPACT portal will be acceptable.

Please contact your project manager or Cara Keslar if you have questions concerning these items or need additional information.

Sincerely,



Nancy E. Vehr  
Air Quality Administrator

Cc: Cara Keslar – AQD, Monitoring Section Supervisor  
Mark Gagen – AQD, CEMS Coordinator  
Daniel Sharon – AQD, Monitoring Project Manager  
Aaron Maisch – AQD, Monitoring Project Manager  
Steven Mugg – AQD, Quality Assurance Coordinator  
Brian Hall – AQD Planning Section Supervisor