

2022 Data Certification Q&A Meeting - 030322

Questions and Answers

Reminders:

- **Data Certification Guidance Documents can be found on the [AMTIC certification site](#) and Data Certification Training can be found on the [AQS Training site](#).**
- **There are no changes to the data certification process or requirements from the CY2020 Data Certification.**

Q1:

Colleen William (Maryland) – We've got a pollutant with less than 50% data capture. We expect that won't factor into a valid design value, but the data we have recorded are good. So, do I say that I want to certify what we have reported?

A1:

Trisha Curran (OAQPS) – With 50% data capture, AQS (in particular the AMP600 certification report) is going to recommend a “N” flag. You can choose to enter a “Y” flag indicating you believe the data in AQS for this monitor is good to use and add a comment stating why.

Per 40 CFR Part 58.15, state and local government monitoring organizations must certify their ambient concentration data and QA/QC data. Only data collected by FRM, FEM, and ARM monitors at SLAMS and SPM monitoring stations that meet Appendix A of 40 CFR Part 58 must be certified. In practice, this refers to monitoring data for CO, NO₂, SO₂ (hourly and 5-minute average data), ozone, lead, PM₁₀, PM_{10-2.53}, and PM_{2.5}. Data is certified when a monitoring agency has entered the certification flags in AQS and submitted the certification package with the required signed letter and reports to EPA. AQS indicates the data is certified when a certifying agency enters and submits an “N” or “Y” flag. Using an “N” flag does NOT mean the data is not certified/un-certified. It indicates that caution is needed when using the data since it may not meet certain requirements, such as data completeness or regulatory QA/QC requirements.

Q2:

Sean Fitzsimmons (Iowa) – There are a few issues with the comparability of the T640 to FRM data. To accommodate this fact, the EPA has introduced a new method code assigned with parameter code 88502 for the T640. So, the method code is 236, they say it's introduced, but it's the same one used for 88101, compliance data. It's just that now it is also allowed for use with 88502 that AQI only. That's important for us because we have data that's taken with the T640 and it's not in the box, so EPA told us we could code it 88502, provided we get approval from our regional office. There's one other issue and that is that most people don't use the T640 which is method code 236. They use T640x which is method code 238, and I don't believe 238 is a method code allowed with parameter code 88502, AQI only. Would you guys be willing to add that for the AQI only parameter code the T640x method code 238? We've already got it for the

T640 and then if EPA gave permission we could handle the lack of comparability between the T640x and FRM would be coded as 88502.

A2:

Tim Hanley (OAQPS) – Yes, we can add it. Once the Regional Office has approved a method in a specific SLT to be set aside for regulatory purposes, they should notify OAQPS and we will add the method code to 88502.

Q3:

Sam Michie – Is the coefficient of variance calculated on the AMP600 for a co-located FEM PM2.5 BAM based on 24-hr averages or hourly values between the two monitors?

A3:

Tim Hanley (OAQPS) – The CV calculation for any collocated PM2.5 method in the AMP600 is intended to be based on 24-hour data.

Q4:

Bo Call – Can this training be moved up earlier in the year? We would like to have any training prior to data certification and this training seems to come after we have certified the data. Thanks.

A4:

Trisha Curran (OAQPS) – We have gotten this question before. I know some agencies finish certain monitoring, like O3 seasonal monitoring, much earlier in the year and are able to certify your data earlier than the May 1st deadline, so we are trying to get the guidance documents out earlier. This year they were posted at the end of January. I am aiming for a little earlier next year. For the webinar portion, our aim is to have this between the beginning of the year and the May 1st deadline, so it won't be too late for those who certify early and not too early for those who certify on May 1st. We are trying to place it half-way in between, early March, in order to accommodate as many agencies as possible. However, if most agencies would prefer to move it to earlier in the year, we can do so, but I haven't received very many requests.

Q5:

Joseph Belzile – On the data validation/certification website there is a link generating an error. [2021 Data Certification QA from 03/31/21 Webinar](#)

A5:

Trisha Curran (OAQPS)/Colin Barrette (OAQPS) – I apologize for the broken link but want to thank Joseph for bringing it to our attention. The link has been repaired.

Q6:

Eric Olson – Are AQS Qualifier code choices significant for data certification?

A6:

Trisha Curran (OAQPS) – Certain codes like exceptional event information or exclusion codes or qualifier codes don't change the raw data values, so it shouldn't affect your data certification. Codes that can affect your data certification are null codes. Null codes are substituted in for the raw data values, effectively removing the raw data, which in turn effects your data completeness. These null codes can then affect your data certification flags in AQS. Any changes to raw data, including adding null codes, after the data has been certified will trigger a needed re-certification.

Q7:

Chad McEvoy (R5) – Some early data certification packages we've received did not correctly identify QAPPs older than 5 years in the AMP600 report. Has this been fixed?

A7:

Trisha Curran (OAQPS) – That has been identified in the past as an issue. We are working on getting that fixed, but we do not yet have a timeline on when that will happen.

Q8:

Paresh Mehta – When will the AMP480 work?

A8:

Staurt Gray (OAQPS) – We have a ticket in with our programmers. We've made the changes. They've written a script and have loaded it into the system. The script is running right now, most of the week, but it has some historical data that it has to go through and by Monday the issue should be resolved.

Robert Coats (OAQPS) – The AMP480 is working now. There were two issues with the Design Values that it displays. 1) Certain site-level data was missing, and this caused the Design Value statistics to be incorrectly calculated. This has been completely fixed. 2) Certain Design Values excluded data from monitors with a NAAQS Exclusion that was not approved by the EPA. That is being addressed and will be resolved before May 1, 2022.

Q9:

Bart (Utah DAQ) – This year when we went to certify there was AQS recommended flag when we first looked (late February). Is there a certain date when that becomes available or was that an error? Flags were missing.

A9:

Trisha Curran (OAQPS) – Anytime you run an AMP600 report, AQS is going to populate an AQS recommended flag based on what is in the system. For example, if you ran the AMP600 for 2022 data right now, which no one has entered their entire years worth of data since we just started the year, AQS will have a recommended flag for whatever data is in AQS for 2022. Since there isn't much or maybe nothing at all AQS will most likely recommend "N" flags for all 2022

right now. If you run an AMP600 report for all your 2021 data and not all of the data for the entire year has been entered yet you may also see “N” flags, since the last quarter of 2021 data isn’t due until the end of March 2022.

Q10:

Namita Verma (Virginia DEQ) – We have received emails about starting a login.gov account from Region 3. Is this likely to impact data certification?

A10:

Stuart Gray (OAQPS) – We are instituting a new login.gov system, it is called the Gateway. It is supposed to use completed close to the end of March. Not sure if this deadline will be met for all of the users but it should not impact data certification. You certify once you are in the system. Login.gov (<https://login.gov/>) is just how you log into the AQS system. Similar to a VPN that you need to log into before you get into AQS. There will be outreach that’s coming out shortly. It’s essentially just a secure way to log in, just a verification that’s supposed to be more secure.

Robert Coats (OAQPS) – Because of an Executive Order from the President, we are instituting a new login authentication approach for the entire EPA: The EPA Gateway. It should not impact data certification.

Q11:

Jaime Hauser – Air Toxics do not require certification, correct? PAMS too?

A11:

Trisha Curran (OAQPS) – Information on what is required to be certified can be found in 40 CFR §58.15 or in the [data certification Q&A Document on the AMTIC page](#).

Only data collected by FRM, FEM, and ARM monitors at SLAMS and SPM monitoring stations that meet Appendix A of 40 CFR Part 58 must be certified. In practice, this refers to monitoring data for CO, NO₂, SO₂ (hourly and 5-minute average data), ozone, lead, PM₁₀, PM_{10-2.53}, and PM_{2.5}.

Data no longer needing certification include:

- Non-FRM/FEM/ARM continuous PM monitors
- PM_{2.5} speciation data - (total mass and speciated components)
- NCore/PAMS data including NO_y, VOC, carbonyl, NH₃, and HNO₃ if collected
- Meteorological data
- Air Toxics data
- Monitors generating data considered not NAAQS comparable

Monitoring agencies can choose to submit an AMP450NC for any non-criteria data. Some agencies may choose to do this for data being used for or in support of designations or other pollutant data used for exceptional events.

Q12:

Sam Michie – Is there any guidance documents coming out regarding bias statistics or null/qualifier code guidance on the zero/span records that are now being submitted to AQS?

A12:

Trisha Curran (OAQPS)/Doug Jager (OAQPS) – There are null/qualifier codes in AQS for raw data based on results from zero/span data. There are no null/qualifier codes in AQS for the zero/span results themselves. We may add them in the future, but we don't have a timeline for when this will be accomplished. For guidance on null/qualifiers and data validation please refer to [Best Practices for Review and Validation of Ambient Air Monitoring Data \(PDF\)](#) and its [Appendix A - Data Verification and Validation Checklists \(xls\)](#) that are posted on the [AMTIC QA](#) site.

Q13:

Paul Fransioli - Method code question for wind parameters 61103 and 61104: Code 068 is for the RM Young sonic anemometer model 86004, which is the heated version of the model 86000. The same unheated instrument is sold by Met One as model 820457. Can the 068 code applicability be expanded to include the model 86000?

A13:

Fletcher Clover (R9) – I sent a request to have this method combination added to AQS. When I get a response I will let you know.

Nealson Watkins (OAQPS) – We can include both the RM Young 86004 and 86000 methods under the 068 code. However, since the MetOne model 820457 is from a different manufacturer, it would need its own code to differentiate it from the RM Young. Please work with your regional office to determine what would be needed.

Q14:

Lisa Wagner - Since we are talking about AQS things, there was an issue with the MDL's in regards to SR and UV (it can be lower than what was originally in the table). I heard that it was changed, but I also noticed that it's the same number for all units that to me didn't seem to make sense. I did bring this up to my Region contact, any comments?

A14:

Kevin Cavender (OAQPS) – Yes, we did lower the acceptable value for SR based on feedback. It is not so much an MDL as a negative value that would be accepted. We did not differentiate between instruments because the value is more a function of the Analog to Digital conversion (we believe) which isn't something we expect to be vendor specific. I don't believe we were having the same issue with UV so we haven't made any changes there.

Q15:

Denise Scott – Can you give a very brief overview of what happens following May 1st deadline? When will data be posted? Doesn't EPA usually post data online and make it available?

A15:

Trisha Curran (OAQPS) – Monitoring agencies post the data into AQS based on the requirements in 40 CFR Part 58 Appendix A. For most criteria pollutants that would be 90 days after the end of a calendar quarter. For example, January – March 2022 data should be posted in AQS by the end of June 2022. Agencies are required to certify their data, meaning entering certification flags and submitting their certification letter and reports (package) to EPA, by May 1st. Once an agency enters certification flags and submits the certification package, the data is officially certified per the regulations. If an agency doesn't enter certification flags by June 1st, AQS will automatically enter "U" uncertified flags for any data that was not certified. After May 1st EPA performs their evaluation of the data in AQS and enters EPA evaluation flags in AQS.

David Mintz (OAQPS) – We expect to post final design values on the [design value page](#) the week of May 25th this year. They were posted the same week last year. The process began early April.