

REGION 4 QUALITY ASSURANCE TRAINING SEPTEMBER 17-19, 2019
ATHENS, GA



Topics to Discuss

- **≻OAPQS Memo Refresher**
- ▶ Policy Updates
- ➤ Data Examples
- > How we lookin'?





- OIG Management Alert issued in February 2017
 - OIG found "variation" in data validation practices
 - Could impact data integrity
 - Memo issued as corrective action response
 - Initial release: August 2017
 - Modified release: January 2018





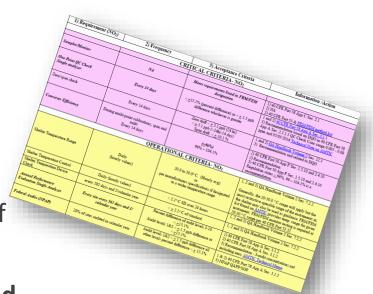
- Memo addresses
 - Critical criteria checks
 - Validity of checks
 - Compelling evidence
 - Data validation steps





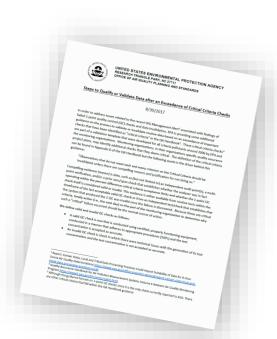
- Critical criteria checks
 - Identified in the QA Handbook
 - Included in validation templates
 - Zero, Precision, Span
 - Critical to precision and accuracy of dataset

"Observations that do not meet each and every criterion on the Critical Criteria should be invalidated unless there are compelling reasons and justification for not doing so."





- Validity of checks
 - Valid check
 - Certified calibrator generating and delivering unaffected test concentrations utilizing proper procedure
 - Can pass or exceed acceptance criteria
 - Valid checks are to be reported
 - Invalid check
 - Calibration system uncertified or malfunctioning
 - Calibrator system failure, leaks, etc.
 - Operator does not follow SOP
 - Check results not reported





- Compelling evidence
 - Data that establishes instrument performance or validity of check
 - Audits
 - Multi-point verification check
 - Zero/Span
 - Diagnostic data
 - All compelling evidence must be documented
 - Not all compelling evidence is reported to AQS





- Data validation steps
 - Changes to AQS
 - New null codes and qualifier flags
 - "EC" null code
 - Can replace ambient data when valid check "exceeds critical criteria"
 - Other codes can be used if better descriptor of scenario (e.g., AN or AS)



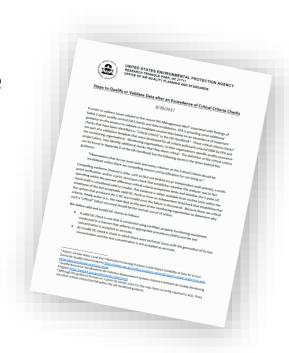


- New null codes and qualifier flags (cont.)
 - "1V" (data was reviewed and validated) qualifier code
 - Combination of "1" (Deviation from a CFR/Critical Criteria requirement) and "V" (Validated Value)
 - Applied to ambient concentration data when compelling evidence exists





- New null codes and qualifier flags (cont.)
 - "1C" (A 1-Point QC check exceeds acceptance criteria but there is compelling evidence that the analyzer data is valid) null code
 - Replaces invalid QC check results
 - This code is NOT meant to replace invalid ambient concentration data
 - Will count toward QC check completion





- Additional changes to AQS
 - Compelling evidence documentation
 - Two methods available:
 - 1. Free form comments
 - Maintain raw data form
 - Short and concise
 - Desired method





- Compelling evidence documentation (cont.)
 - 2. AMP600 certification and concurrence
 - AMP600 report modifications
 - Will identify QC exceedances
 - Check data handling
 - Not handled according to memo
 - Automatically flag data
 - Require compelling evidence





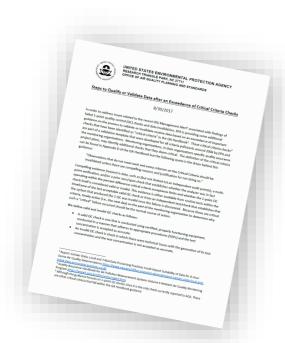
Topics to Discuss

- ➤ OAPQS Memo Refresher
- Policy Updates
- Data Examples
- ➤ How we lookin'?



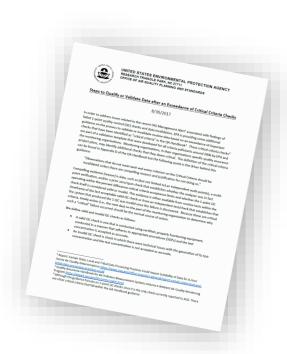


- Clarifications from OAQPS (June 2019)
 - 1. Valid ambient concentration data;
 Valid QC data
 - Report the ambient concentration and QC data to AQS "as is"
 - QC check will be counted towards completeness and precision/bias statistics





- <u>2. Invalid ambient concentration data;</u> Valid QC data
 - Invalidate ambient concentration data in AQS with appropriate null code(s)
 - Report the QC data to AQS "as is"
 - QC check will be counted towards completeness, but it will NOT be counted in precision/bias statistics
 - Reference Scenario #1 in the policy memo





- <u>3. Valid ambient concentration data;</u> Invalid QC data
 - Report the ambient concentration data, qualified as needed
 - Report the "1C" null code in place of the QC check in the AQS QA transaction
 - The "1C" code will be counted towards completeness, but it will NOT be counted in precision/bias statistics
 - Reference Scenario #2 in the policy memo





- <u>4. Invalid ambient concentration data;</u> Invalid QC data
 - Invalidate ambient concentration data in AQS with appropriate null code(s)
 - Report the "1C" null code in place of the QC check in the AQS QA transaction
 - The "1C" code will be counted towards completeness, but it will NOT be counted in precision/bias statistics





- Clarifications from OAQPS for PM checks (June 2019)
 - <u>1. Invalid ambient concentration data;</u> <u>Valid QC data</u>
 - Invalidate ambient concentration data in AQS with appropriate null code(s)
 - Report the QC data to AQS "as is"





- 2. Invalid PM QC data
 - Do NOT report the QC data to AQS





Topics to Discuss

- ➤ OAPQS Memo Refresher
- **→**Policy Updates
- Data Examples
- ➤ How we lookin'?





A local agency completes automated nightly zero/span/precision checks (ZSPs) of their O3 monitors during the 2300 hour.

On March 30, the automated precision check (1-pt QC) exceeded the <±7.1% difference acceptance criteria in the agency's QAPP (-8.6%).

The site operator visited the site the following day and completed a manual ZSP of the monitor. Allowing sufficient time for the monitor to stabilize for each concentration, the 1-pt QC exceeded acceptance criteria once again (-7.1%).



Given the results of both the automated and manual 1-pt QCs, and no evidence of QC system malfunction, the agency determined that both checks should be considered <u>valid</u>.

Consequently, the agency decided to handle associated data in the following ways:

- Invalidate the data collected by the monitor <u>back to the March 29</u>
 <u>passing 1-pt QC</u> (-5.7%) and <u>forward to the site operator's</u>
 <u>recalibration of the monitor on March 31</u>
- The concentration data is invalidated with the "<u>EC</u>" (Exceeds Critical Criteria) null code in AQS
- Upload the results of both 1-pt QCs to AQS

Example #1 (Timeline)

ROURINE CONCENTRATION COTO INVOITO QC results 3/29 (Auto QC check passes) uploaded 3/30 (Auto QC check exceeds) to AQS acceptance criteria) 3/31 (Manual QC check exceeds acceptance criteria) 3/31 (Monitor recalibrated)



Example #1 (Summary)

March 29

Auto 1-pt QC passes (-5.7%d)

March 30

 Auto 1-pt QC exceeds acceptance criteria (-8.6%d)

March 31

- Manual 1-pt QC exceeds acceptance criteria (-7.1%d)
- Monitor recalibration

Checks are valid

Data invalidated ("EC") from 3/29 1-pt QC until 3/31 monitor recalibration

All 1-pt QC check results uploaded to AQS



A state agency completes automated zero/precision checks (ZPs) of their SO2 monitors from 12:45-1:15 AM on a weekly basis.

On August 14, the automated precision check (1-pt QC) exceeded the <±10.1% difference acceptance criteria in the agency's QAPP (-12.9%).

The site operator visited the site two days later and completed a manual ZP of the monitor. Allowing sufficient time for the monitor to stabilize for each concentration, the 1-pt QC passed (-5.7%).

While on site, the site operator noticed that the datalogger programming did not allow the August 14 1-pt QC sufficient time to stabilize (i.e., the 1-pt QC concentration did not stabilize prior to the datalogger initiating a zero concentration phase).



Given the information available, the agency determined that the August 14 automated 1-pt QC should be considered invalid because the check was not allowed to stabilize and, thus, produced a concentration not truly representative of the monitor's calibration.

Consequently, the agency decided to handle associated data in the following ways:

- Upload the collected concentration data with no further qualification (the August 14 1-pt QC did not produce a representative assessment of the monitor's calibration)
- Upload the "<u>1C</u>" null code (A 1-Point QC check exceeds acceptance criteria but there is compelling evidence that the analyzer data is valid) in place of the August 14 1-pt QC results to AQS in the QA transaction
- Upload the results of the manual August 16 1-pt QC to AQS

Example #2 (Timeline)

8/14 (Auto QC check invalid)

Routine concentration data valid

8/16 (Manual QC check passes)

QC results uploaded to AQS

"1C"
uploaded to
AQS in QA
transaction in
place of
invalid 1-pt
QC



Example #2 (Summary)

August 14

Auto 1-pt QC fails (-12.9%d)

August 16

Manual 1-pt QC passes (-5.7%d)

August 16 Troubleshooting

 8/14 auto 1-pt QC not allowed sufficient time to stabilize Concentration data uploaded "as-is"

8/14 check is invalid; "1C" null code uploaded to AQS in the QA transaction in place of the QC check results

Lack of 8/14 check stability documented as compelling evidence to retain concentration data

8/16 check is valid; results uploaded to AQS



A local agency NO2 monitor is audited annually by the state.

On July 24, the state agency completed a performance audit (APE) of the monitor, which yielded acceptable results (% differences ranged from -11% to -13%) within the <±15.1% difference acceptance criteria in the agency's QAPP.



The local agency completes automated zero/precision/span checks (ZPSs) of their NO2 monitor during the hours of 0300 and 0400 on alternating nights.

On July 25, the precision check (1-pt QC) exceeded the <±15.1% difference acceptance criteria in the agency's QAPP (-16%).

The site operator visited the site on July 26 and completed a manual ZPS of the monitor. Allowing sufficient time for the monitor to stabilize for each concentration, the 1-pt QC exceeded acceptance criteria once again (-16%).



Given the results of both the automated and manual 1-pt QCs, and no evidence of QC system malfunction, the agency determined that both checks should be considered <u>valid</u>.

The agency also decided that there is sufficient compelling evidence to retain the concentration data collected between the most recent passing July 23 1-pt QC and the July 24 APE. This data is qualified with the "1V" (Data reviewed and validated) qualifier code in AQS to indicate that there is sufficient compelling evidence to accept some data between the July 25 exceedance of acceptance criteria and the most recent valid 1-pt QC on July 23.



Consequently, the agency decided to handle associated data in the following ways:

- Invalidate the data collected by the monitor <u>back to the July 24 APE</u> and <u>forward to the site operator's recalibration of the monitor on</u> <u>July 26</u> with the "<u>EC</u>" null code in AQS
- The concentration data between the passing July 23 1-pt QC and the July 24 APE is qualified with the "<u>1V</u>" qualifier code in AQS; the agency decides and <u>documents</u> that the APE provided sufficient compelling evidence that the monitor's calibration was within acceptance criteria at the time of the APE
- Upload the results of all 1-pt QCs to AQS

Example #3 (Timeline)

7/23 (Auto QC check passes)

Routine concentration data qualified "1V"

7/24 (APE passes)

Routine Concentration of the Concentration 7/25 (Auto QC check exceeds acceptance criteria)

7/26 (Manual QC check exceeds acceptance criteria)

7/26 (Monitor recalibrated)

QC/QA results uploaded to AQS



Example #3 (Summary)

July 23

Auto 1-pt QC passes (-14%d)

July 24

APE passes (-11 to -13%d)

July 25

Auto 1-pt QC exceeds acceptance criteria (-16%d)

July 26

acceptance criteria (-16%d)

Manual 1-pt QC exceeds

Data qualified ("1V") from the passing 7/23 1-pt QC until the 7/24 APE

Data invalidated ("EC") from the 7/24 APE until the 7/26 monitor recalibration

All 1-pt QC/APE results are valid and uploaded to AQS

APE documented as compelling evidence to retain data from 7/23 to 7/24

Monitor recalibrated



A state agency completes automated zero/precision/span checks (ZPSs) of their SO2 monitor during the 0300 hour every two weeks.

On January 3, the automated precision check (1-pt QC) exceeded the <±10.1% difference acceptance criteria in the agency's QAPP (-21.4%).



The site operator visited the site the next day and completed a manual ZPS of the monitor. Allowing sufficient time for the monitor to stabilize for each concentration, the 1-pt QC exceeded acceptance criteria once again (-20%).

Following this check, the site operator completed some troubleshooting while on site. He determined that the analyzer housing for the particulate filter was not properly sealed; the operator had documented replacement of this filter on December 22.

Immediately after tightening the particulate filter housing, the site operator completed another ZPS, and the 1-pt QC passed at -2.9%.



Example #4

Given the information available, the agency determined that the automated January 3 and the first manual January 4 1-pt QCs should be considered <u>valid</u> because the calibration system was functioning properly and the check was completed according to SOP.

The agency also decided that there is sufficient compelling evidence to retain the concentration data collected between the most recent passing December 20 1-pt QC and the December 22 analyzer filter replacement. Since there was no bracketing check available to validate the data, the agency qualified such data with the "1V" qualifier code in AQS.



Example #4

- Consequently, the agency decided to handle associated data in the following ways:
 - Upload the concentration data between the passing December 20 1-pt QC and the December 22 filter replacement qualified with the "<u>1V</u>" qualifier code in AQS
 - Invalidate the data (e.g., "BJ" (Operator Error)) collected by the monitor <u>back to the December 22 particulate filter</u> <u>replacement</u> and <u>forward to the site operator's tightening</u> <u>of the analyzer's particulate filter housing and subsequent</u> <u>1-pt QC on January 4</u>
 - Upload the results of the January 3 & 4 1-pt QCs to AQS

QC results uploaded to AQS

Example #4 (Timeline)

12/20 (Auto QC check passes)

Routine concentration data qualified "1V"

12/22 (Analyzer leak created)

1/3 (Auto QC check exceeds acceptance criteria)

1/4 (Manual QC check exceeds acceptance criteria)

1/4 (Leak eliminated; Manual QC check passes)

QC results uploaded to AQS



Example #4 (Summary)

December 20

Auto 1-pt QC passes (0%d)

January 3

 Auto 1-pt QC exceeds acceptance criteria (-21.4%d)

January 4 (#1)

 Manual 1-pt QC exceeds acceptance criteria (-20%d)

January 4 Troubleshooting

 12/22 analyzer particulate filter replacement created an analyzer leak. The leak was then corrected

January 4 (#2)

Manual 1-pt QC passes (-2.9%d)

Data qualified ("1V") from the 12/20 QC check until the 12/22 filter replacement

Analyzer leak/filter replacement documented as compelling evidence to retain data from 12/20 to 12/22

Data invalidated ("BJ") from the 12/22 filter replacement until the leak was corrected

1/3 and 1/4 (#1 & #2) QC check results reported to AQS

TSA Example: "1C" Reporting

Method of Collec	tion and A	Analysis		INSTRUMENTAL		ULTRA	VIOLETABS(ORPTION		
Site/Poc.	Method Assess Date			erAssessConc.	Monitor Conc.	%Diff	Unit Abbr.	Valid	Null Code	Comments
	087	2017- 07- 10	1				ppb	Υ	1C	
	087	2018- 08- 27	1				ppb	Υ	1C	
	087	2016- 03- 07	1	101	100	- 1	ppb	Υ		
	087	2016- 03- 14	1	101	96	- 5.0	ppb	Υ		
	087	2016-03-21	1	101	101	0	ppb	Υ		
	087	2016-03-28	1	102	100	- 2.0	ppb	Υ		
	087	2016- 04- 04	1	101	101	0	ppb	Υ		
	087	2016- 04- 11	1	101	100	- 1	ppb	Υ		
	087	2016- 04- 18	1	101	101	0	ppb	Υ		
	087	2016- 04- 25	1	101	101	0	ppb	Υ		
	087	2016-05-02	1	101	100	- 1	ppb	Υ		
	087	2016-05-09	1	101	100	- 1	ppb	Υ		

AQS QA Transactions (below) associated with the boxed transactions in the AMP251 (above)

```
QA|I|1-Point QC|xxxx|xx|xxx|xxxx|44201|1|20170710|1|087|008|||1C|
QA|I|1-Point QC|xxxx|xx|xxx|xxxx|44201|1|20180827|1|087|008
```

TSA Example: 1-pt QC free-form comments

087	2017- 04- 05	1	70	75	7.1	ppb	wrong intercept used in
087	2017- 05- 03	1	69	75	8.7	ppb	calculation wrong intercept used in
087	2017- 05- 22	1	69	75	8.7	ppb	calculation wrong intercept used in
087	2017- 05- 26	1	70	75	7.1	ppb	calculation wrong intercept used in calculations

AQS QA Transactions (below) associated with the transactions in the AMP251 (above)

QA I 1-Point	QC xxxx xx xxx	xxxx 44201 1	20170405	1 087 008	75 70 wrong	intercept us	ed in	calculation
* ' '	QC xxxx xx xxx							
* ' '	QC xxxx xx xxx					•		
QA I 1-Point	QC xxxx xx xxx	xxxx 44201 1	. 20170526	1 087 008	75 70 wrong	intercept us	ed in	calculations

TSA Example: Invalid Concentration Data ("EC")

MONITOR TYPE: SLAMS COLLECTION AND ANALYSIS METHOD: (087) INSTRUMENTAL ULTRA VIOLET ABBORPTI PQAO: HOUR COLLECTION AND ANALYSIS METHOD: (087) INSTRUMENTAL ULTRA VIOLET ABBORPTI HOUR 4/5/17: 7.1% difference MIN DETECTABLE: .005																								
DAY	0000	0100	0200	0300	0400	0500	0600	0700	0800	0900	1000	1100	1200	1300	1400	1500	1600	1700	1800	1900	2000	2100	2200	2300
1	EC	EC	EC	EC	BC	EC	EC	BC	EC	BC	EC	AY												
2	EC	EC	EC	EC	BC	EC	EC	BC	EC	BC	EC	AY												
3	EC	EC	EC	EC	BC	EC	EC	BC	EC.	EC	BC	EC	AY											
4	EC	EC	EC	EC	BC	EC	EC	BC	P/C	EC	BC	EC	AY											
5	EC	EC	EC	EC	BC	EC	EC	BC	AX	EC	BC	EC	AY											
6	EC	EC	EC	EC	BC	EC	EC	BC	EC	AY														
7	EC	EC	EC	EC	BC	EC	EC	BC	EC	AY	EC	EC	BC	EC	EC									
8	EC	EC	EC	EC	BC	EC	EC	BC	EC	AY														
9	EC	EC	EC	EC	BC	EC	EC	BC	EC	AY														
10	EC	EC	EC	EC	BC	EC	EC	BC	EC	BC	EC	AY												
11	EC	EC	EC	EC	BC	EC	EC	BC	EC	BC	EC	AY												
12	EC	EC	EC	EC	BC	EC	EC	BC	AX	.045 V	.052 V	.055 V	.056 V	.058 V	.058 V	.059 V	.060 V	.061 V	.055 V	.052 V	.053 V	.053 V	.052 V	AY
13	.047 V	.043 V	.038 V	.036 V	.037 V	.035 V	.036 V	.027 V	.032 V	.043 V	.046 V	.055 V	.061 V	.063 V	.064 V	.065 V	.066 V	.066 V	.065 V	.064 V	.065 V	.059 V	.053 V	AY
14	.052 V	.044 V	.041 V	.034 V	.033 V	.032 V	.028 V	.022 V	.023 V	.037 V	.054 V	.063 V	.066 V	.073 V	.074 V	.075 V	.075 V	.073 V	.066 V	.059 V	.061 V	.061 V	.056 V	AY
15	.053 V	.048 V	.046 V	.042 V	.042 V	.039 V	.039 V	.032 V	.034 V	.032 V	.045 V	.049 V	.052 V	.054 V	.054 V	.056 V	.057 V	.055 V	.055 V	.052 V	.051 V	.052 V	.052 V	AY
16	.052 V	.051 V	.049 V	.048 V	.046 V	.042 V	.038 V	.038 V	.039 V	.046 V	.047 V	.048 V	.049 V	.051 V	.049 V	.050 V	.050 V	.051 V	.050 V	.048 V	.047 V	.045 V	.044 V	AY
17	.038 V	.036 V	.037 V	.032 V	.032 V	.028 V	.023 V	.021 V	.017 V	.020 V	.029 V	.038 V	.043 V	.048 V	.052 V	.053 V	.045 V	.039 V	.032 V	.029 V	.025 V	.024 V	.019 V	AY
18	.019 V	.024 V	.023 V	.028 V	.028 V	.026 V	.029 V	.029 V	.029 V	.030 V	.027 V	.027 V	.028 V	.029 V	.036 V	.037 V	.037 V	.037 V	.038 V	.037 V	.033 V	.027 V	.025 V	AY
19	.017 V	.015 V	.017 V	.017 V	.017 V	.017 V	.018 V	.020 V	.022 V	.027 V	.031 V	.036 V	.040 V	.045 V	.050 V	.048 V	.048 V	.047 V	.044 V	.040 V	.039 V	.041 V	.037 V	AY
20	.027 V	.022 V	.017 V	.015 V	.010 V	.018 V	.014 V	.012 V	.015 V	.025 V	.027 V	.035 V	.045 V	.046 V	.047 V	.048 V	.047 V	.045 V	.043 V	.044 V	.042 V	.037 V	.041 V	AY
21	.036 V	.029 V	.024 V	.023 V	.022 V	.024 V	.025 V	.024 V	AX	.029 V	.041 V	.052 V	.048 V	.043 V	.035 V	.034 V	.032 V	.032 V	.030 V	.021 V	.018 V	.027 V	.028 V	AY
22	.020 V	.028 V	.032 V	.030 V	.024 V	.025 V	.021 V	.019 V	.022 V	.020 V	.024 V	.028 V	.033 V	.037 V	.043 V	.040 V	.034 V	.037 V	.029 V	.029 V	.040 V	.048 V	.044 V	AY
23	.032 V	.028 V	.027 V	.024 V	.021 V	.023 V	.021 V	.022 V	.022 V	.022 V	.024 V	.028 V	.029 V	.029 V	.030 V	.031 V	.030 V	.029 V	.027 V	.024 V	.024 V	.023 V	.023 V	AY
24	.024 V	.024 V	.023 V	.022 V	.021 V	.024 V	.023 V	.025 V	.028 V	.029 V	.032 V	.035 V	.034 V	.038 V	.040 V	.039 V	.037 V	.032 V	.031 V	.031 V	.030 V	.026 V	.026 V	AY
25	.028 V	.025 V	.017 V	.015 V	.015 V	.013 V	.004 V	.010 V	.011 V	.018 V	.028 V	.032 V	.036 V	.037 V	.038 V	.040 V	.041 V	.040 V	.038 V	.039 V	.038 V	.031 V	.031 V	AY
26	.024 V	.020 V	.017 V	.010 V	.008 V	.006 V	.007 V	.006 V	AX	EC	BC	EC	AY											
27	EC	AY																						
28	EC	EC	EC	EC	BC	EC	EC	BC	EC	AY														
29	EC	EC	EC	EC	BC	EC	EC	BC	EC	BC	EC	AY												
30	EC	EC	EC	EC	BC	EC	EC	BC	EC	BC	EC	AY												
31																								

TSA Example: Invalid Concentration Data ("EC")

Secondary Seco	MONITO	OR TYPE:	SLAMS											REPORT 1	FOR:	MAY	20	17			D	URATION:	1 HOUR		
															ts per million										
Note											- 5	/2/	17	· Q	7%	dit	tera	anc	'				_		
DATE Color Color		UR									/	121		υ.	/ /0	ull	CIV								
No. No.	DAY	0000	0100	0200	0300	0400	0500	0600	0700	0800	0900	1000	1100	1200	1300	1400	1500	1600	1700	1800	1900	2000	2100	2200	2300
No. No.	1	EC		EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	BC	EC								
No. No.	2	EC	EC	EC	EC	EC	EC	EC	BC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	BC	EC	AY
A	3							EC		AX		EC	EC	EC	EC	EC	EC	EC	EC	EC		EC	BC		
Re	4	EC	EC	EC	EC	EC	EC	EC	EC	A170-	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	BC	EC	AY
1	5	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	BC	EC	AY
S	6	EC	EC	EC	EC	EC	EC	EC	BC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	BC	EC	AY
B	7	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	AY
10 RC	8	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	BC	EC	AY
R	9	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	BC	EC	AY
12	10	EC	EC	EC	EC	EC	EC	EC	BC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	BC	EC	AY
13	11	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	BC	EC	AY
14	12	EC	EC	EC	EC	EC	EC	EC	BC	AX	.033 V	.035 V	.041 V	.044 V	.048 V	.050 V	.046 V	.040 V	.043 V	.039 V	.036 V	.032 V	.028 V	.024 V	AY
15	13	.020 V	.025 V	.025 V	.023 V	.025 V	.022 V	.019 V	.021 V	.027 V	.030 V	.032 V	.035 V	.040 V	.043 V	.047 V	.049 V	.049 V	.050 V	.048 V	.044 V	.043 V	.043 V	.045 V	AY
16	14	.038 V	.031 V	.029 V	.023 V	.020 V	.023 V	.020 V	.018 V	.033 V	.040 V	.052 V	.054 V	.057 V	.060 V	.059 V	.060 V	.061 V	.063 V	.063 V	.065 V	.063 V	.061 V	.059 V	AY
18 RC	15	.049 V	.038 V	.031 V	.032 V	.028 V	.024 V	.021 V	.023 V	.032 V	.042 V	.056 V	.064 V	.065 V	.065 V	.064 V			.061 V	.059 V	.056 V	.052 V	.050 V	.047 V	AY
18	16	.044 V	.036 V	.029 V	.030 V	.022 V	.017 V	.013 V	.021 V	.032 V	.043	197	. 0 € V	7071	0 770	062	FFX	.073 V	.066 V	.057 V	.052 V	.053 V	.054 V	.054 V	AY
19 8C	17	.049 V	.053 V	.050 V	.053 V	.046 V	.038 V	.023 V	.019 V	AX	EC 🔾		F L .	Ec. C	EC /	10 U	神に		ILC	EC	EC	EC	EC	EC	AY
20	18	EC	EC	EC	EC	EC	EC	EC	EC	EC	C	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	BC	EC	AY
22 BC	19	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC							AY
22 BC	20	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	176	E	75 7	PEC O	€ C ~	iffa	ron	60	AY
23 EC	21	EC	EC	EC	EC	EC	EC	EC		10.00	EC	EC	EC	EC	EC			<i>⊫</i> ⊥ .	EC	\$C/	⊕ U	非に	E.C		AY
24 EC	22	EC	EC	EC	EC	EC	EC	EC	BC		EC	EC	EC	EC	EC	&C	EC	ĒC	EC	EC	EC	EC	BC	EC	AY
25 EC	23	EC	EC	EC	EC	EC	EC	EC	BC	EC	EC	EC	EC	EC			EC	EC	EC	EC	EC	EC	BC	EC	AY
26 BC	24	EC	EC	EC	EC	EC	EC	EC	BC	EC	EC	EC	EC	EC		EC	EC	EC	EC	EC	EC	EC	EC	EC	AY
27 EC	25	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC				EC	EC	EC	EC	EC	EC	EC	EC	AY
28 EC	26	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC			BC	EC	EC	EC	EC	EC	EC	EC	AY
29 EC	27																					EC			AY
30 EC	28																								AY
	29	EC	EC	EC	EC	EC	EC	EC	BC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	EC	AY
31 EC AX AX BC .062 V .059 V .059 V .050 V .047 V .042 V .039 V .041 V AY	30																								
	31	EC	EC	EC	EC	EC	EC	EC	BC	EC	EC	EC	AX	AX	BC	.062 V	.059 V	.058 V	.059 V	.050 V	.047 V	.042 V	.039 V	.041 V	AY



Topics to Discuss

- ➤ OAPQS Memo Refresher
- **→**Policy Updates
- ➤ Data Examples
- > How we lookin'?





Important Things to Note

Document your decisions

- Maintain detailed records for future review
- Free-form comments in AQS
- AMP600 changes

Prompt response to field issues

 If no investigation is completed as a result of a QC check that exceeds acceptance criteria, the check should be considered valid and associated data invalidated



Important Things to Note

- Valid and properly nullified QC data in AQS will be counted toward completeness statistics
- Valid QC data in AQS associated with invalidated concentration data will not be included in aggregate precision/bias statistics
- Report all valid checks (40 CFR Part 58, Appendix A, Section 5.1.1)



Questions? Comments? Concerns?

Keith Harris

(706) 355-8624

harris.keith@epa.gov

Tony Bedel

(706) 355-8552

bedel.anthony@epa.gov