

Air Quality Filter Weighing Service Guidance

Introduction

The Tribal Air Monitoring Support (TAMS) Center was formed in 2000 through a cooperative agreement between the U.S. Environmental Protection Agency (EPA, the Northern Arizona University (NAU) Institute for Tribal Environmental Professionals (ITEP) and the tribes with the mission of developing tribal capacity to assess, understand, and prevent environmental impacts that adversely affect health, culture, and natural resources. Assisting tribes with their monitoring needs has always been the integral component of the TAMS Center mission. In 2002 under the guidance from TAMS Steering Committee (SC), the TAMS Center established a gravimetric laboratory capable of weighing Particulate Matter (PM) filters. The intent of the TAMS Gravimetric Laboratory was to provide temporary weighing support until a tribe was able to identify a lab to replace the services of the TAMS Laboratory. Initially five (5) tribes signed on to use the services of the TAMS gravimetric lab. This number has fluctuated throughout the years; in 2013 there were nine (9) tribes using the lab which represents about 2,250 filters per year (f/yr.). The SC began this update to the guidance in October 2014 to reflect the change in organization of the facility to fall under the National Center for Radiation and Field Operation (NCRFO). This version resulted from the discontinuation of the service due to decisions made by EPA and budget cuts that eliminated the program. The six Tribes utilizing the service were allowed to finish 3 consecutive years. Filter weighing was transferred to a private contractor with an end date in 2016. Results from the 2012 need assessment instigated by the SC indicated that a demand for a filter weighing still existed. The SC decided to pursue reestablishing the service by drafting and approving an Air Quality Filter Weighing Service Concept Paper that provides the justification and steps to do so. This document was identified as the first step to accomplishing that goal.

Preparing for filter weighing service

The following are suggested steps Tribal programs should have in place before applying for TAMS Center filter weighing service:

1. Emission Inventory completed or in progress
2. Goals and objectives for filter based monitoring
3. Standard Operating Procedures
4. Quality Assurance Project Plan, (draft minimum)

Applicants may request Professional Assistance through the TAMS Center for any or all of the suggested steps listed above.

The major tenets of this approach include:

- Start of Service: Any tribe requesting to use the filter weighing service must submit an application to the SC by June 1 to receive service during the following fiscal year (October 1). Applications received after this deadline may not receive services but will be considered. Tribes currently receiving services can reapply toward the end of their specified service duration. In order to keep

transparency in the process, only criteria in the written requests will be used in the decision making process.

- Short Term Service: Applications for short term use of the service to help a tribe understand projects, sources or other needs can be made on a continuous basis. Applicants should allow 2 months for review and approval before the expected start date.
- Monitoring Program Maturity: As a general rule, the “first in-first out” paradigm will be used. This means that those tribes that have been using the service the longest will be the first ones asked to find other options for filter based weighing.
- Duration of Service: Tribes will be given a maximum of three calendar years of service if needed. The Tribe should declare their duration of service, since the TAMS Center may be able to accommodate additional Tribes if some need less than three years. The SC will consider extending service past the three year limit based on justification and demand.
- End of Service: A Tribe not selected to continue receiving service will be notified by the earliest possible date so that they may get their affairs and funding in order if they wish to continue filter based monitoring. A listing of qualified labs will be provided. TAMS Center staff will help facilitate the transition.

The SC will use the criteria below during the decision making process. Only information in the written application will be used and considered to keep transparency in the SC decisions. The SC Chairperson will direct a member to provide a written summary of pending applications for distribution to the entire committee. The report will also include copies of all written applications. Acceptance or denial of an application will occur during a SC conference call or at an in-person meeting and be determined by consensus or vote.

Evaluation Criteria

- Objective of data collection
- Tribe located in or adjacent to a possible Non-Attainment area for PM
- General lack of current or historical monitoring
- Concern for Sensitive Groups (such as children and asthmatics)
- New Tribal air programs wanting to establish monitoring capability
- Has not monitored for PM
- Has not used the TAMS gravimetric lab or filter weighing service in the past or for more than 3 years total
- QA/QC - Tribes that have and follow a Quality Assurance Project Plan

This document is effective immediately and will be used on all current and future participants in the TAMS filter weighing gravimetric lab service. The SC is to use only this document for decision making purposes. Any variation from this paper will require the rewrite and approval by the SC.

The Tribal Air Monitor Support Center Steering Committee approved this document on January 21, 2015