Clean Air Status and Trends Network Third Party Audits: Coordinating with Monitoring Organizations

To perform an audit at a CASTNET site each auditing agency must follow these steps:

1) Determine the operating agency by accessing the CASTNET site information page here: https://www.epa.gov/castnet/castnet-site-locations. Select the site and find the Operating Agency under Site Information.

2) Email your request 4 weeks ahead of a proposed audit to the appropriate EPA, NPS, or BLM contact:

Position	Name	Agency*	Phone	Email
EPA Technical Monitor (TM)	Timothy Sharac	EPA, CAMD	202-243-9180	sharac.timothy@epa.gov
NPS Program Manager (PM)	Barkley Sive	NPS, ARD	303-987-6947	barkley_sive@nps.gov
BLM Program Manager (PM)	Ryan McCammon	BLM, WY	307-775-6156	rmccammon@blm.gov
Contractor Point of Contact (CPOC)	Marcus Stewart	Wood	352-333-6608	marcus.stewart@woodplc.com
Contractor Point of Contact (CPOC)	Mike Slate	ARS	970-484-7941	mslate@air-resource.com

^{*}EPA, CAMD = Environmental Protection Agency, Clean Air Markets Division

NPS, ARD = National Park Service, Air Resources Division

BLM, WY = Bureau of Land Management, Wyoming

Wood = Wood Environment & Infrastructure Solutions, Inc.

ARS = Air Resource Specialists, Inc.

3) Include the following information in your request to the TM/PM:

Third Party Auditor Provides	Contractor Point of Contact Provides		
Agency and auditor information	Site access information		
Site(s) to be audited	Site operator contact information		
Audit type and parameters of interest	Site visitor protocols (includes signing in and out of the monitoring facility)		
Request for site operator presence during audit	Schedule to accommodate all parties		
Proposed audit schedule - keep in mind that a site operator is at the site for approximately 45 minutes every Tuesday morning, special requests can permit other times with advance notice.	Site technical support as needed regarding the audit (to facilitate audit performance and returning the site to normal operating condition)		
Audit results upon completion			

a. **About scheduling the audit**: Provide a date range of when you plan on auditing the site, keep in mind that CASTNET ozone monitors are remotely operated and a site operator is typically at the site for approximately 45 minutes every Tuesday. In most cases, special trips by the site operator can be made to allow for the audit if the site operator has two weeks' advanced notice.

b. Audit follow-up: Submit the audit results to TM and the CPOC within 30 days.

Essential Coordination

Third party audits are an important mechanism for EPA regions or state and local agencies to assess the performance of project monitoring – particularly ozone and ozone precursors analyzers. The three components of data security – access, confidentiality, and integrity are critical to CASTNET operations. To ensure the success of the monitoring program while allowing for third party audits, it is obligatory for third party auditors to follow the steps laid out in this document (Figure 1). CASTNET shelters and equipment are typically owned by the operating agency and maintained by Wood or ARS. The land may be owned by the site operator, an institution, or government agency. Unauthorized entry into a CASTNET shelter without prior coordination may pose both data security and/or liability risks to the monitoring program and respective company. Access to CASTNET sites and equipment will be arranged upon request as detailed in Figure 1. The EPA Technical Monitor (TM) is the primary point of contact for all third party audits of CASTNET sites.

CPOC contacts States/Regions **EPA TM contacts** State/Region to Contact EPA TM to CPOC discuss specifics arrange audit and finalize EPA TM ensures audit report is shared with CPOC / NPS PM / BLM PM State/Region Audit report is Audit is performed contacts site shared with EPA per arrangement operator for TM appointment

Figure 1. Third Party Audit Procedure

Attachment 1: Operations at Remote CASTNET Sites

Site Description

CASTNET's primary goal is to operate effectively as a national, long-term ambient air pollutant and deposition monitoring network that provides information for assessing the effectiveness of current and future emission reductions. CASTNET's primary objectives are:

- To monitor the status and trends in air quality and atmospheric deposition;
- To provide atmospheric data on the dry deposition component of total acid deposition, rural groundlevel ozone, and other forms of atmospheric pollution that enter the environment as particles and gases;
- To gauge compliance with ozone National Ambient Air Quality Standards;
- To assess and report on geographic patterns and long-term, temporal trends in ambient air pollutant concentrations and acid deposition;
- To provide scientifically defensible data to gauge the effectiveness of EPA emission reduction programs;
- To improve understanding of particulate matter and ozone formation;
- To evaluate and improve atmospheric air quality/deposition models;
- To provide data for health-based research and epidemiology studies; and
- To support science and ecosystem studies.

The CASTNET design requires sites to be located in rural or remote locations away from pollutant emission sources and heavily populated areas. Sites are therefore located in areas that range from university research stations to national parks and nature preserves to privately owned land. Accordingly site operators are a diverse mix of university students, park rangers, private landowners, etc. The network is designed for automated operation and remote management with onsite visits for physical sample collection and routine service once per week each Tuesday. The procedures required for these site visits is the main focus for CASTNET site operators. The site operators work closely with the remote station managers to monitor conditions onsite and resolve technical issues¹ that may occur.

Coordinating a Site Visit

The procedure depicted in Figure 1 should be followed when arranging a site visit. A site operator may have to take time off from work or drive a significant distance to meet an auditor. The lead time described in the associated text is necessary to give site operators sufficient time to make arrangements to meet a visitor onsite.

¹ The site operators are not responsible for instrument calibrations. The remote station managers should be contacted for any technical support or troubleshooting.

Conducting a Site Visit

CASTNET sites are secured. The site operator will provide access on the day of the audit. Upon arrival, please sign into the station's narrative log with name, organization, and purpose of visit. The site operator will be responsible for lowering/raising the sampling tower, downing/upping data logger channels, and ensuring operational integrity and security of the station after audit completion.

The site operator will also be responsible for recognizing analyzer stability and calling the final concentrations for audit challenge points with few exceptions. Occasionally, the remote station managers will be required for establishing stability and final concentrations due to site operators with limited availability or technical expertise in determining stability from instrument traces. These exceptions will be identified ahead of the audit, associated arrangements will be made (e.g. contact numbers), and all parties notified. The remote station managers should be contacted for any technical assistance and troubleshooting.

Upon audit completion, please provide the preliminary audit data to the EPA Technical Monitor.

Attachment 2: Audit Responsibility Matrix

NPAP-TTP Scheduling – Site Groups One (1) and Two (2)*

Task	NPAP Auditor	Site Operator	Wood/ARS Point of Contact	EPA/NPS/BLM Manager
Schedule audit one month prior	1,2	1,2	1,2	1,2
Confirm audit one week prior	1,2	1,2	1,2	
Day of audit communication	1,2	1,2		

^{*}Site Group One: Site operator determines analyzer stability and response Site Group Two: Wood/ARS Point of Contact determines analyzer stability and response

NPAP-TTP Procedure – Site Groups One and Two

	Task	Task Responsibility by Site Group		Wood/ARS Point of	EPA/NPS/BLM Manager
		NPAP	Site	Contact	
		Auditor	Operator		
1	Unlock gate & shelter door		1,2		
2	Verify equipment is operating properly		1,2		
	and data are reasonable, including ZSP				
3	Down data logger channels and record		1,2		
	time that channels were downed				
4	Tilt down the tower		1,2		
5	Connect NPAP-TTP audit lab tubing to	1,2			
	sample inlet				
6	Indicate when the station ozone analyzer		1	2	
	is stable and report the response				
7	Repeat step 6 for all audit points		1	2	
8	Provide preliminary audit data after		1,2	1,2	1,2
	completion to:				
9	Tilt up the tower		1,2		
10	Up data logger channels and record time		1,2		
	that channels were upped				
11	Verify equipment is operating properly	_	1,2		
	and data are reasonable				
12	Lock gate & shelter door		1,2		