



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

APR 22 2016

Mr. Michael Benjamin, Chief
California Air Resources Board
Monitoring and Laboratory Division
1927 13th Street
Sacramento, California 95811

Dear Mr. Benjamin:

The purpose of this letter is to formalize the responsibilities of both the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency Region 9 (EPA) with respect to Technical Systems Audits (TSAs). In our role as the federal oversight agency, EPA is responsible for conducting TSAs of Primary Quality Assurance Organizations (PQAOs) every three years (40CFR58 Appendix A section 2.5). The CARB PQAO consists of CARB plus 21 local California air agencies. Monitoring requirements have recently changed so that local agencies within a PQAO should be audited on a six-year schedule. Formalizing roles and responsibilities for TSAs for the CARB PQAO will help ensure that regulatory requirements for TSAs within the CARB PQAO continue to be met.

EPA's TSAs of the CARB PQAO have included an audit of CARB's air monitoring operations plus three local districts. Each audit has typically consisted of visiting both the CARB and local agency offices, laboratories, and monitoring stations; interviewing CARB and local agency management and staff; and conducting data tracking for CARB and local district regulatory data. These audits allow EPA to assess how the PQAO as a whole is functioning, obtain feedback from both the CARB implementers and the agency implementers, and identify issues that may affect not only specific agencies but the broader PQAO. We then work together with CARB on any issues identified in order to ensure data quality and defensibility.

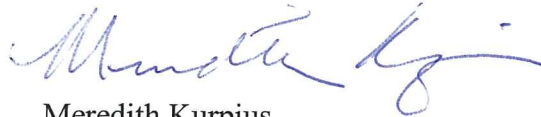
As the lead quality assurance oversight agency for all of the agencies within the CARB PQAO, CARB performs many critical functions, including conducting TSAs for the entire PQAO. CARB's leadership in conducting TSAs within the CARB PQAO has strengthened quality assurance throughout the PQAO in many important ways. For example, the TSA activities allow CARB to see first-hand how agencies are implementing their quality systems and where improvements are needed to ensure high quality, defensible data. Further, the CARB-led TSAs promote collaboration and communication between CARB and the local districts within the PQAO which helps maintain the high quality system over the long-term.

EPA and CARB have been working effectively together to conduct TSAs for all agencies within the CARB PQAO. The enclosed document formalizes expectations between EPA and CARB regarding coordination for conducting TSAs of the agencies within CARB's PQAO. Our coordinated efforts as outlined in the enclosed document will allow EPA and CARB to fulfill the regulatory requirements for conducting TSAs and provide appropriate oversight on both the federal and PQAO level.

We appreciate all the effort by CARB to maintain a robust air monitoring network in California and we look forward to continuing to work together.

Please contact me if you have questions at (415) 947-4534 or kurpius.meredith@epa.gov. Otherwise, we look forward to receiving confirmation that we are aligned in our expectations of the TSA roles and responsibilities for our respective agencies.

Sincerely,



Meredith Kurpius
Manager, Air Quality Analysis Office

Enclosure

cc (via email):

Michael Miguel, CARB

Ken Stroud, CARB

Patrick Rainey, CARB

Cooperative Approach Between EPA and CARB for Conducting Technical Systems Audits of Agencies within California Air Resources Board's PQAO

Overview

In order to fulfill regulatory requirements and perform oversight appropriate to their respective roles, the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency Region 9 (EPA) will conduct technical systems audits (TSAs) of all local agencies conducting regulatory monitoring within CARB's primary quality assurance organization (PQAO) every six years.

Timing

Every three years, EPA will audit CARB's air monitoring program plus three agencies within CARB's PQAO: EPA will be the lead agency for these audits. CARB will audit the remaining agencies within the six-year period: CARB will be the lead agency for these audits. As there are currently 21 agencies operating regulatory monitors within CARB's PQAO, this equates to CARB conducting TSAs of two to three agencies per year.

TSA Scheduling

Prior to each TSA EPA conducts of the CARB PQAO (i.e., every three years), EPA and CARB will work together to review the six-year cycle of TSAs and create the TSA schedule for the next three years. The TSA schedule will include the year that each local agency will be audited and identify either EPA or CARB as the lead. This will inform EPA's selection of agencies to include in its TSA and also ensure that all agencies are on target to be audited within the six year timeframe. This list will be jointly reviewed annually. Changes can be made to the schedule if both agencies agree and the regulatory requirement for TSAs can still be met.

Roles and Responsibilities for EPA-lead TSAs

For TSAs where EPA is the lead agency, EPA is responsible for preparation, scheduling, communications, conducting the TSA, and writing the report. CARB may participate in select TSAs for training purposes. CARB is responsible for conducting a factual correction of the draft report and coordinating corrective action responses (plans and implementation responses) within CARB and with all applicable CARB PQAO agencies. CARB will formally transmit corrective action plan(s) to EPA. EPA will review and formally respond to corrective action requests.

Roles and Responsibilities for CARB-lead TSAs

For TSAs where CARB is the lead agency, CARB is responsible for preparation, scheduling, communications, conducting the TSA, and writing the report. EPA may participate in select TSAs to confirm that TSAs are being conducted in accordance with EPA requirements. CARB will provide a copy of the final report to EPA. CARB is responsible for coordinating corrective action responses (plans and implementation responses) within the applicable CARB PQAO agencies and will provide summaries of corrective action approvals and closures.

TSA Methodology

To ensure consistency across the audits, EPA and CARB will follow protocols that conform to EPA requirements when conducting TSAs. EPA will provide up-to-date TSA guidance and templates to CARB and will review any modifications to EPA's protocols. EPA will provide training on TSA procedures as needed. EPA will also participate in CARB-led TSAs as needed to promote consistency between CARB and EPA TSAs.

In conforming with the above, EPA and CARB fulfill both the regulatory requirements for conducting TSAs and provide appropriate oversight on both the federal and PQAO level.