



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

NOV 17 2011

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Guidance on the Pb Performance Evaluation Program for Monitoring Organizations Who Are Monitoring for Pb Only at NCore Sites

FROM: Lewis Weinstock, Group Leader *LW*
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TO: Air Monitoring Program Managers and Staff

On December 27, 2010, the lead (Pb) monitoring regulation was revised to include monitoring at NCore sites. At that time, we changed the quality assurance requirement for collocation at NCore sites. If the **only** Pb site a primary quality assurance organization (PQAO) had was at NCore, the EPA revised the collocation requirement to a national level so that 15 percent of the NCore sites (for PQAO's that do not have additional required Pb monitoring) would be collocated and, therefore, each PQAO would not need a collocated Pb monitor at the NCore site. The Regions have been delegated the authority to select these sites.

The EPA did not address in the regulation how the Pb-PEP would be covered for PQAOs that only had Pb monitoring at NCore. Pb-PEP at NCore (where the NCore site was the monitoring organization's only Pb site) was also intended to be performed nationally, meaning that Pb-PEP was only required to be performed at about 15 percent of the NCore sites, not at the PQAO level. The Pb-PEP requires¹:

1. 1 side-by-side audit with a second instrument which is usually implemented by an Environmental Services Assistance Team (ESAT) auditor or federal personnel, and
2. 4 filters (additional) from a collocated sampler.

Based on requirement #2, the logical solution to implementing the Pb-PEP at the NCore sites is to utilize the NCore sites that have been selected for Pb collocation. Since the Pb-NCore sites are expected to be operational by late December 2011, we will start Pb-PEP implementation of these sites in calendar year 2012.

Some Regions have already worked with their monitoring organizations to select the NCore sites for Pb collocation. Those Regions that have not performed this activity should do so over the next 30 days so that the Pb-PEP implementation is not delayed. Earlier this year, we distributed a paper that identified the most appropriate sites for collocation based on information from the regional monitoring and QA staffs. Please review this information and work with your monitoring organizations to finalize these decisions. Once the collocated sites are identified, Dennis Crumpler (OAQPS Pb-PEP lead) will work with the Regional QA Staff to implement Pb-PEP at these NCore sites.

¹ See 40 CFR part 58 Appendix D, section 3.3.4.4