

# **Quality Assurance Project Plan for the Martinez Refining Company Fence-Line Monitoring Program**

**Revision 5.2  
FLM-QLT-QAPP-001**

**Martinez Refining Company**

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## List of Acronyms

APCO – Air Pollution Control Officer for the BAAQMD.

BAAQMD – Bay Area Air Quality Management District

BTEX – Benzene, Toluene, Ethylbenzene, Xylenes

DQO – Data Quality Objectives

EPA – Environmental Protection Agency

FTIR – Fourier Transform Infrared Spectrometer

H<sub>2</sub>S – Hydrogen Sulfide

LDL – Lower Detection Limit

MBC – Martinez Business Center

MET – Meteorological Station.

MRC – Martinez Refining Company

MQO – Measurement Quality Objectives

OEHHA – Office of Environmental Health Hazard Assessment

PPB – Parts Per Billion

QA/QC – Quality Assurance / Quality Control

QAPP – Quality Assurance Project Plan

SO<sub>2</sub> – Sulfur Dioxide

TRI – Toxic Release Inventory

UV-DOAS – Ultraviolet Differential Optical Absorption Spectroscopy

UDL – Upper Detection Limit

## Section 1 – Fence-Line Monitoring Overview

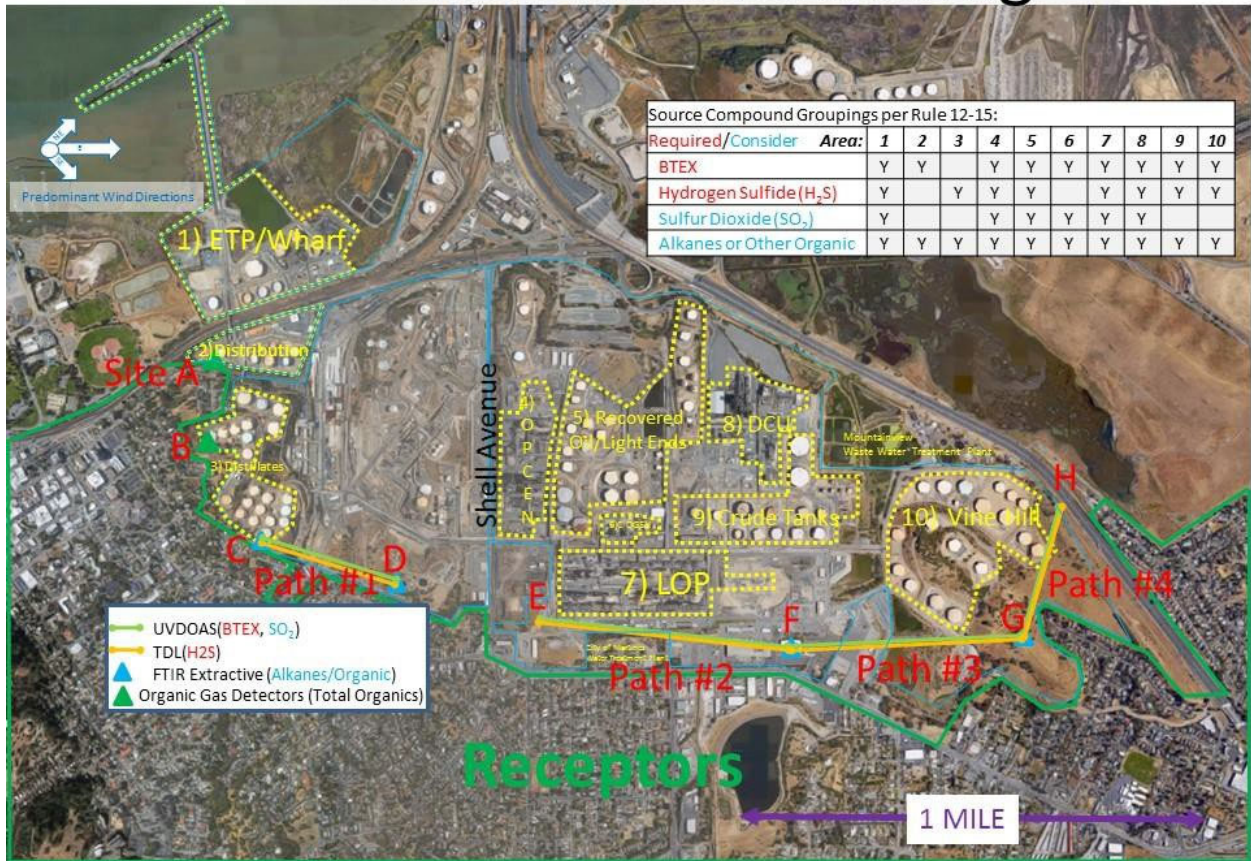
On April 20, 2016, the Bay Area Air Quality Management District (BAAQMD) adopted Regulation 12 Rule 15 which requires Bay Area refineries to develop and submit an Air Monitoring Plan for APCO approval to establish and operate a fence-line monitoring system. The BAAQMD also published guidelines for refineries to meet the fence-line monitoring requirements. Martinez Refining Company's policy is to comply with all local and federal environmental regulations including the fence-line monitoring provisions of BAAQMD Rule 12-15. This includes meeting all downwind fence-line siting requirements, uptime requirements, and reportable quantifiable detection levels. Siting included the evaluation of five years of meteorological data as well as seasonal and recurring short-term meteorological events (such as quarterly wind roses) in assessing siting positions per the BAAQMD guidance document. Site locations for the fence-line equipment were selected to strategically position the fence-line monitors using the predominant and variable meteorological conditions and topographical terrain features within the refinery.

### Description of the Fence-Line Monitoring Program

A complete description of the Fence-Line Monitoring program is included in the MRC Air Monitoring Plan. The program is comprised of open-path air monitoring systems for the detection and quantification of benzene, ethylbenzene, sulfur dioxide, toluene, and xylene. Total Alkanes are measured using extractive FTIR air monitoring systems. Total Organics are measured with Organic Gas Detectors. Meteorological conditions are measured using EPA compliant MET equipment. Figure 1.1 presents a map of the refinery showing the locations of the air monitoring equipment. Table 1.1 presents the site location for each piece of equipment.

Figure 1.1 - Map of Fence-line Monitoring Program\*

# Fence-Line Monitoring



\*Note – The fence line paths showing TDL (H<sub>2</sub>S) monitoring are not included in this QAPP. This equipment is currently under evaluation.

**Table 1.1 - Monitoring Site Locations**

Site # Name	GPS (North)	GPS (West)	Elevation (Feet)	Instrument
Site A	38°01'19.21"N	122°07'41.98"W	35	Organic Gas Detector
Site B	38°01'11.17"N	122°07'46.16"W	169	Organic Gas Detector
Site C S Distillates	38°00'59.26"N	122°07'35.22"W	164	UV DOAS Source FTIR Extractive
Site D Firewater Tanks	38°00'54.02"N	122°07'17.13"W	207	UV DOAS Receiver FTIR Extractive
Site E SW LOP	38°00'51.08"N	122°06'56.10"W	91	UV DOAS Source
Site F MBC	38°00'47.40"N	122°06'23.04"W	55	UV DOAS Source UV DOAS Receiver FTIR Extractive
Site G Vine Hill	38°00'48.69"N	122°05'49.60"W	211	2 UV DOAS Receiver  FTIR Extractive
Site H I-680	38°01'01.66"N	122°05'44.38"W	102	UV DOAS Source

All air monitoring equipment specified for the MRC refinery fence-line system are specified to collect data on five-minute averages. All air monitoring equipment specified for the MRC refinery will meet a minimum of 75% completeness on an hourly basis 90% of the time based on annual quarters. Atmospheric conditions beyond the control of the refinery that affect accurate measurements, such as dense fog, shall not be counted against data completeness requirements if appropriate meteorological measurements document time periods when these conditions exist. The specific criteria for validation of data that includes screening for weather related events or other issues associated with data quality is included in Section 4 – Quality Management System. Data from the monitoring stations will be transmitted to an Internet website where the real-time results can be viewed by the public. The real-time website page will be incorporated into a larger website that will present additional resources to assist in the interpretation of the data. Tables 1.2 and 1.3 summarize the gases included in the fence-line program and the technology used to detect them, along with the lower and upper detection limits (LDL and UDL). LDLs for the data generated by the equipment are normally set to be at least two times the manufacturer’s claimed detection limit. This is done to minimize the occurrence of false detections being reported to the real-time public website, as these lower limits are often generated under ideal conditions, and if the system is operating in less than ideal conditions (such as when there’s fog or rain) the system will generate false detections.



**Table 1.2 – Detection Limits for Gases Monitored by Open-Path Systems**

	Path 1		Path 2		Path 3		Path 4	
Distance (m)	445		810		825		435	
Gas	LDL (ppb)	UDL (ppb)	LDL (ppb)	UDL (ppb)	LDL (ppb)	UDL (ppb)	LDL (ppb)	UDL (ppb)
Benzene	0.8	5,483	0.5	3,012	0.4	2,958	0.9	5,609
Ethyl Benzene	4.5	5,483	2.5	3,012	2.4	2,958	4.6	5,609
Sulfur Dioxide	4.0	2,202	2.2	1,210	2.2	1,188	4.1	2,253
Toluene	1.8	2,742	1.0	1,506	1.0	1,479	1.8	2,805
Xylene	1.0	2,742	0.5	1,506	0.5	1,479	1.0	2,805

**Table 1.3 – Detection Limits for Gases Monitored by Point Source Samplers**

Point Source Monitor	Detection Limits	
	LDL (ppb)	UDL (ppb)
Total Alkanes	75	4,200
Total Organics	10	100,000

## Section 2 – Project Management

### Fence-Line Monitoring Task Organization

The program is organized between MRC and the contractor tasked with operating and maintaining the systems. Figure 2.1 shows the organizational structure for the Monitoring Program.

#### Key MRC Personnel

**Program Manager** - The Program Manager is responsible for managing the work performed by the contractor operating and maintaining the fence-line system. This will include overseeing the contractor's operation and maintenance of the fence-line monitoring system and ensuring the program is operated in a safe manner.

#### Key Contractor Personnel

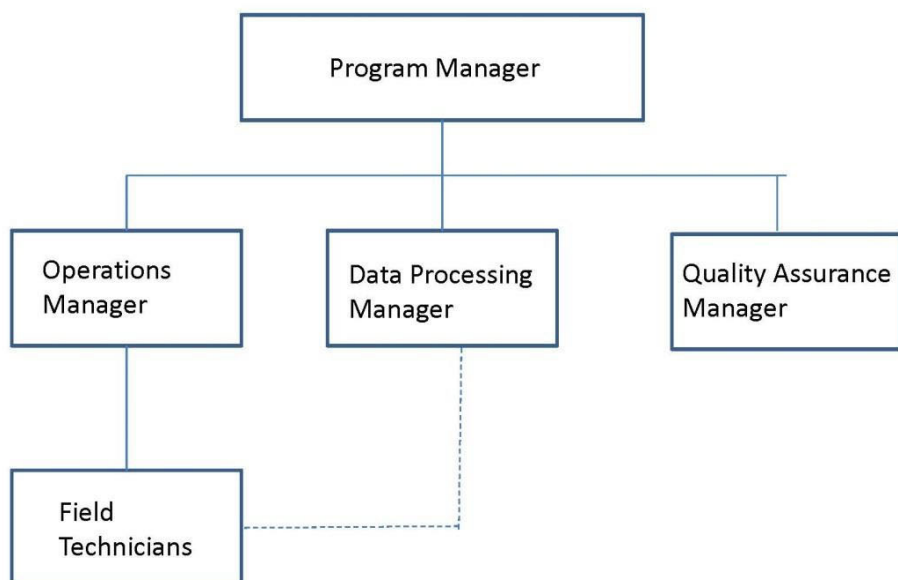
**Contractor Program Manager** – The Contractor Program Manager is responsible for overseeing the day to day operation of the fence-line program and is the primary interface between the contractor staff and MRC staff. Other duties include ensuring all contractor personnel perform all work in a safe manner and follow all standard operating procedures associated with the fence-line monitoring program.

**Contractor Quality Assurance Manager** – The Quality Assurance Manager is responsible for ensuring all Standard Operating Procedures are updated and maintained. Additional responsibilities include maintaining all records associated with the real-time monitoring databases as well as summarizing and storing all data quality records associated with the fence-line monitoring program.

**Contractor Data Processing Manager** – The Contractor Data Processing Manager is responsible for ensuring the data quality objectives, the measurement quality objectives, and on-stream efficiency statistics are met for the fence-line monitoring program.

**Contractor Field Technician** – The Contractor Field Technician is responsible for the day-to-day operation of the fence-line monitoring system including following an equipment operation verification and maintenance schedule to assure data quality.

Figure 2.1 – MRC Fence-line Air Monitoring Program Organization Chart



## Personnel Qualification and Training

The operators of the monitoring equipment shall be trained in the operation, maintenance and operation verification of the equipment, as well as have resources to troubleshoot any technical issues. All personnel will undergo annual equipment specific refresher training. Training will be provided by an instructor who has undergone vendor specific training for each analyzer. The Quality Assurance Manager will document the training and verify field technicians have successfully completed the training. The following are the basic skills and training of each of the personnel:

### Field Technicians

- Key Performance Areas
  - Perform Routine maintenance and quality checks, as required, and record data in accordance with these tasks.
  - Perform routine site visits to perform QA/QC or maintenance.
  - Perform minor onsite repairs.
  - Inform superiors when consumable purchases and instrument maintenance are required.
  - Monitor alarms and work with the Operations manager to troubleshoot and solve them in a timeous manner.

- Align open path systems.
- Assist the operations manager with instrument commissioning and any other duties that are required.
- Qualifications and Experience
  - Knowledge or Community College/College degree in one of:
    - Chemistry
    - Environmental
    - Engineering
  - Understanding of Quality systems such as ISO 17025
  - Three years' experience

#### Data Processing Manager

- Key Performance Areas
  - Data processing and validation on a daily basis and compilation of resultant reports
  - Delivery of results to the client for daily, monthly and calibration reports, including report preparation
  - Ensure that reporting is completed in a prompt manner and within quality guidelines.
  - Monitor alarms and work with the Operations Manager to troubleshoot and solve them in timeous manner.
  - Verify gas detections for approval by the Program Manager.
- Qualifications and Experience
  - Knowledge or Community College/College degree in one of:
    - Chemistry
    - Environmental
    - Engineering
  - Understanding of Quality systems such as ISO 17025
  - Three years' experience

#### Operations Manager

- Key Performance Areas
  - Work with customers and Program Manager to maintain a schedule of site work for the technical teams.
  - Maintain a workflow system to manage the progress and completion of projects in a systematic and transparent manner.
  - Keep technical teams updated with any changes in schedules.
  - Arrange safety inductions and communicate these to team members.
  - Ensure that sufficient stock of the consumables required for the work is available.

- Collate and review the raw data and ensure all log sheets and sampling datasheets are correctly filled in and signed.
  - Ensure a safe working environment is maintained at all times.
  - Keep records of all data consistent with the company's Quality Management System.
  - Ensure the quality of presentation of all reports and client communications.
  - Act as a Technical Signatory and sign reports.
- Qualifications and Experience
    - Science or Environmental College Degree (Post Graduate qualification preferable)
    - Business or administrative qualification advantageous
    - At least five years' industrial engineering experience

#### Program Manager

The Technical Manager will manage and coordinate the activities of all technical aspects of the project, participate in management meetings and will ensure that the program meets its objectives for providing a service of high technical quality to its clients. The Program Manager will coordinate with the Quality Department on quality matters.

- Competencies
  - Strong technical knowledge in fence-line, ambient and emission testing
- Qualifications and Experience
  - College Degree with Honors qualification or higher, specializing in Environmental Services, Science or Engineering
  - Minimum five years' experience in Environmental Management or Consulting

#### Quality Manager

The quality manager will coordinate quality assurance programs and formulate quality control policies. They also work to improve an organization's efficiency and profitability by coordinating continuous improvement processes.

- Key Performance Areas
  - Oversee the quality process.
  - Update quality system documentation.
  - Train employees.
  - Manage the corrective action process.
  - Analyse data to facilitate continuous improvement.

- Qualifications and Experience
  - College Degree with Honors qualification or higher, specializing in Environmental Services, Science, quality or Engineering
  - Minimum three years' experience in Quality Management
  
- Competencies
  - Strong technical knowledge in fence-line, ambient and emission testing

## Section 3 – Description of Hardware

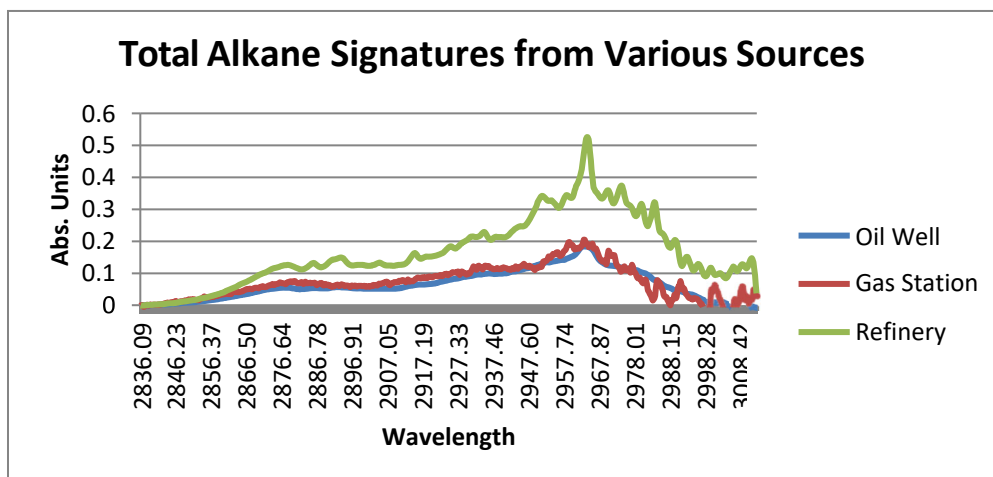
### Sample Analysis

Samples will be collected using UV DOAS air monitors for the measurement of Benzene, Ethylbenzene, Sulfur Dioxide, Toluene, and Xylene. Extractive FTIRs will be used for the measurement of total alkanes. Organic Gas Detectors will be used for total organics. Each analyzer has a vendor specific method for collecting and quantifying data. A description of each specific analytic method is listed below:

#### Extractive FTIR

The FTIR air-monitoring system is a point sample air monitor that can be used for fence-line monitoring applications. The unit has the capability to detect total non-methane hydrocarbons on a real-time basis while minimizing the impact of gases that interfere with alkane measurement such as water vapor and methane gas. The analytical method employed by the FTIR is a multiple regression technique that separates the total amount of light absorbance by the various gases and outputs a result for each gas. In the case of alkanes, this includes the contribution of interfering gases such as water vapor and methane. The system also has the ability to distinguish between various sources of alkanes. Figure 3.1 shows the different types of spectral signatures for various sources of alkanes. The system has the ability of undergoing data and quality assurance checks in the field by monitoring known ambient gases or by using gas standards. Total Alkanes (regardless of source) will be displayed on the website, however, during the monthly QA process, the data may be identified as not originating from the refinery depending on its spectral signature. The methodology to identify sources involves collecting the spectral features for alkanes when the wind direction is from different sources i.e. various refinery process areas, local highways, and other industrial facilities. Once these data are collected, the resulting absorbance spectra can be converted in a qualitative library spectrum that can be inserted in the analytic software which then analyses the data. The results of the analysis will include residuals that can be used to identify specific sources.

Figure 3.1 - Spectral Signature of Alkanes from Various Sources



### Open-path UV DOAS

The UV DOAS air monitoring system detects Benzene, Toluene, Ethylbenzene, Xylene, and Sulfur Dioxide on a real-time basis using beams of ultraviolet light. A beam of light is sent out in the open air to a light detector at the other end of the beam path. The system identifies gases by examining the wavelengths of UV light that have been absorbed by the gases present in the light beam. The amount of gas in the air is proportional to the amount of light absorbed at specific wavelengths.

The system uses a multivariate method to quantify data. This analytic approach is critical to ensure false detections of gas do not occur. Each target gas has a spectral library of gases covering the concentration range of the analyzer. It also includes libraries of potential interfering gases such as oxygen and ozone. In addition, the system has the ability of undergoing data and quality assurance checks in the field by using a sealed gas cell.

### Organic Gas Detector

The Organic Gas Detectors are based on the principal of photoionization and are referred to as Photoionization Detectors (PIDs). The systems work by inserting a sample of ambient air into a sample chamber where it is exposed to a small lamp that produces ultraviolet light. If an organic gas is present in the sample, it will interact with the UV light and become ionized. Once, ionized it can be measured with a gas detector. The major advantage of the PID air monitoring system is its sensitivity in that it can measure organic gases at very low concentrations in the air. The limitation to the system is it cannot discriminate between the different types of organic gases that are in the air. In addition, it cannot measure C2-C3 hydrocarbons but is capable of measuring the majority of gases associated with refining.



## **Meteorological Station**

The East Side MET Station will provide real time wind direction to the website.

Meteorological instruments will be operated according to the EPA Quality Assurance Handbook for Air Pollution Measurement Systems Volume IV PSD Measurement Quality Objectives.

## **Data Collection**

### **Workstations**

The analyzers use Microsoft Windows based computer workstations to collect, analyze, and transmit data. The workstations will be industrial grade computer workstations.

### **Routers**

Computer routers will be used to network the analyzers together so the information from each system can be transmitted to the Internet.

### **Remote Restart Equipment**

Internet based remote restart equipment will be attached to critical parts of the monitoring system to ensure the equipment can be powered down and turned on remotely in the event a system requires a restart to clear an error status.

### **Cloud-based Data Storage**

Data from the monitoring network will be stored on a cloud-based storage system with data backup capability.

## Section 4 – Quality Management System

The overall goals of the fence-line monitoring program are referred to as “Data Quality Objectives” or “DQOs”. The specific DQOs for the monitoring program at the MRC is ensuring all of the data, both real-time and QA/QC meets the quality standards for presentation to the public and the BAAQMD.

Throughout the measurement process, focus is placed on three different specific elements of the monitoring program including the instruments themselves, the data collected, and the overall management of the program. MRC’s Quality Assurance Project Plan (QAPP) uses a multi-level process to validate system performance. Four levels of review take place. Each level builds on the prior level, including the level of technical expertise possessed by the individuals reviewing the information.

Level 0 checks are based on historical real-world experience associated with operating and maintaining fence-line systems. Level 0 checks are automated real-time screening checks that are performed continuously. Levels 1, 2, and 3 checks are formulated around EPA Quality Assurance/Quality Control protocols published in documents such as:

Environmental Technology Verification (ETV) Protocol for Optical Remote Sensors

[https://archive.epa.gov/nrmrl/archive-etv/web/pdf/01\\_vp\\_openpath.pdf](https://archive.epa.gov/nrmrl/archive-etv/web/pdf/01_vp_openpath.pdf)

EPA – Compendium Method TO-16

<https://www3.epa.gov/ttn/amtic/files/ambient/airtox/to-16r.pdf>

EPA – FTIR Guidance Document

<https://www3.epa.gov/ttn/amtic/files/ambient/longpath/r-96-040.pdf>

Level 1 checks are performed on a daily or weekly basis depending on the application. Level 2 checks are performed monthly, and Level 3 checks are performed on a quarterly and/or annual basis, and this includes an annual audit.

For each level of review, specific “Measurement Quality Objectives” or “MQOs” have been developed. MQOs are defined as the specific performance criteria to evaluate whether the objective is met. When each of the MQOs are satisfied, this assures that the overall goals of the monitoring program (the DQOs) are being met. If any one of these MQOs are not met, corrective action will be initiated to address the issue. Each MQO will be evaluated and if necessary updated as part of the Internal System Audit Plan as well as during the Annual Management Review. A summary of the MQO’s for each instrument, data quality parameter, and program management process is listed in Table 4.1 below. A detailed description of the operational parameters associated with the specific elements of the fence-line system are included in the Operations Guidance Document “FLM-QLT-GUI-001 Operations Guidance Document”.

**Table 4.1 – Summary of MQO's for Each Instrument**

Check Type	Check	Frequency	Reference Document
<b>Level 0</b>			
Instrumentation	Light Signal from Optical Remote Sensors	Real-time	FLM-QLT-GUI-001, FLM-QLT-SOP-002
Instrumentation	Instrument Error Codes	Real-time	FLM-QLT-SOP-001
Instrumentation	Environmental Checks for UV	Real-time	FLM-QLT-SOP-001
Data	Quantitative/Qualitative Data Check	Real-time	FLM-QLT-SOP-001
Data	FTIR - Methane and N2O	Real-time	FLM-QLT-SOP-001
Data	UV - Oxygen and Ozone	Real-time	FLM-QLT-SOP-001
Program	Analyzer has low signal	Real-time	FLM-QLT-GUI-001, FLM-QLT-SOP-002
Program	Analyzer off-line	Real-time	FLM-QLT-SOP-001
Program	Workstation fails	Real-time	FLM-QLT-SOP-004
Program	Internet communication failure	Real-time	FLM-QLT-SOP-001
Program	Gas detected above alarm value	Real-time	FLM-QLT-SOP-001
<b>Level 1</b>			
Instrumentation	System noise - FTIR and UV	Monthly	FLM-QLT-SOP-007
Instrumentation	Single point check - FTIR, and UV	Monthly	FLM-QLT-SOP-008
Data	Validate detects - FTIR and UV	Daily	FLM-QLT-SOP-006
Data	Negative detects - FTIR and UV	Daily	FLM-QLT-SOP-006
Data	Verification of detects above threshold	Daily	FLM-QLT-SOP-006
Program	Equipment operation	3 x per day	FLM-QLT-SOP-001
Program	Website operation	3 x per day	FLM-QLT-SOP-001
Program	Data logging	3 x per day	FLM-QLT-SOP-001
Program	Message board update	3 x per day	FLM-QLT-SOP-001

**Table 4.1 (cont.) – Summary of MQO’s for Each Instrument**

<b>Check Type</b>	<b>Check</b>	<b>Frequency</b>	<b>Reference Document</b>
<b>Level 2</b>			
Instrumentation	Detection limit FTIR and UV	Quarterly	FLM-QLT-QAPP-001, FLM-QLT-SOP-007
Instrumentation	Precision FTIR, UV, and OGD	Quarterly	FLM-QLT-QAPP-001, FLM-QLT-SOP-011
Instrumentation	Accuracy FTIR, UV, OGD	Quarterly	FLM-QLT-QAPP-001, FLM-QLT-SOP-009
Instrumentation	Linearity FTIR, UV, OGD	Quarterly	FLM-QLT-QAPP-001, FLM-QLT-SOP-010
Data	Data trends associated instrumentation performance	Weekly	FLM-QLT-SOP-006
Data	Differences between current data and historical data	Weekly	FLM-QLT-SOP-001
Data	Insert data in final QA/QC'd data base	Weekly	FLM-QLT-SOP-013
Program	Summary of calibration and maintenance activities	Monthly	FLM-QLT-SOP-008
Program	Summary of problems and corrective actions	Monthly	IMS-QLT-MAN-010, IMS-QLT-MAN-008
Program	Monthly summary report with OSE updated	Monthly	FLM-QLT-SOP-014
<b>Level 3</b>			
Instrumentation	Annual service FTIR, UV and OGD	Annual	FLM-QLT-SOP-005
Instrumentation	Certification system brought to factory spec	Annual	FLM-QLT-SOP-014
Data	Full reconciliation of data	Monthly	FLM-QLT-SOP-014
Data	Supervisor check for data trends	Monthly	FLM-QLT-SOP-014

## Instrument Specific - Quality Assurance/Quality Control

The following checks are used to determine the hardware included in the fence-line air monitoring system are operating in a manner that meets all factory specifications. A complete listing of the specific parameters associated with vendor specific equipment is included in FLM-QLT-GUI-001 Operations Guidance Document. It should be noted that any data that is considered to be invalid can be reviewed using spectral analysis by a trained data analyst.

### Level 0 – Continuous, Real-time Operational Checks

Monitor system output to include:

- Light signal from optical remote sensing analyzers
- Analyzer error codes
- Operational environment of UV analyzers

### Level 1 – Monthly Operational Checks

- Evaluate system noise (FTIR and UV)
- Single point calibration checks (FTIR, UV)

### Level 2 – Quarterly Operational Checks

- Detection limit checks (FTIR and UV)
- Precision, linearity, accuracy checks (FTIR, UV, OGD)

### Level 3 – Annual Operational Checks

- Annual servicing of instruments (FTIR, UV, OGD)
- Validate systems are meeting original factory acceptance specifications

## Data Management / Validation

The following checks are used to determine the data included in the fence-line air monitoring system meets all data quality requirements. A complete listing of the specific parameters associated with vendor specific equipment is included in FLM-QLT-GUI-001 Operations Guidance Document. It should be noted that all data is collected and stored in its original format and data that fails to meet the data quality requirements is flagged with a code that lists the specific data check that failed.

## Level 0 – Continuous, Real-time Operational Checks

Monitor Data Output:

- Utilize manufacture's analytic software for quantitative results and independent secondary analytic software for qualitative results.
- Check ambient gases such as ozone and oxygen (UV), and methane, N<sub>2</sub>O for FTIR.

## Level 1 – Daily Review

- Identification of detects where real-time MQOs indicate corrective action is needed, such as validating data when qualitative and quantitative detects do not reconcile (FTIR, UV)
- Flagging data as being invalid due to weather related conditions or operational events, such as QA/QC, maintenance activities etc. (FTIR, UV)
- Identification of gas detects above action levels

## Level 2 – Weekly Checks

Validation Staff Review with consideration of historical data and similar measurements. Once data is reviewed and validated it will be inserted into the final database.

On a weekly basis, data will be summarized and reviewed to identify:

- Data trends associated instrumentation performance
- Differences between current data and historical data

## Level 3 – Quarterly Checks

- Supervisor level review with consideration of interrelationships with other data
- A full reconciliation of data that had to be invalidated or corrected
- A summary of the monitoring data and performance of the fence-line monitoring system

## Monitoring Program Response

The entire fence-line monitoring system is continually monitored for system performance. This includes the instruments, workstations, and Internet communication hardware. If at any time an element of the system fails to meet normal performance criteria, a message is generated immediately to key personnel at MRC and the Contractor who will begin activities to correct the problem. The following checks are used to determine the data included in the fence-line air monitoring system meets all data quality requirements. A complete listing of the parameters associated with vendor specific equipment as well as messages and times in the status of the equipment is updated is included in the FLM-QLT-GUI-001 Operations Guidance Document.

## Program Management

### Level 0 – Continuous, Real Time System Checks

Automated notifications generated when:

- Analyzer has low signal
- Analyzer off-line
- Workstation fails
- Internet communication failure
- Gas detected above alarm value

### Level 1 – Daily System Checks

The contractor will monitor the fence-line system three times per day.

Systems will be checked for:

- Equipment operation
- Website operation
- Data Logging
- Message Board Update

### Level 2 – Monthly Report and Review of Operational Performance

- Monthly summaries of calibrations and maintenance activities completed during the month, and a summary of audit results completed during the month, if applicable
- A description of problems that occurred during the month, including such things as power failures or system component problems and their resolution or proposed corrective actions
- Monthly reports summarizing gas detections, operational performance statistics (on-stream efficiency) and significant events associated with the fence-line monitoring system will be generated.

### Level 3 – Annual Program Audit

System will undergo an annual independent audit of the entire monitoring program. Findings and observations will be addressed with corrective action plans.

Statue report of annual service by equipment vendor will be reviewed and maintenance program updated if necessary.

## Section 5 – Instrument Maintenance

Instrument service and repair calls are conducted as needed, based on continuous evaluation of instrument error codes. In addition to service and repair calls conducted on an as needed basis, preventive maintenance is conducted based on the schedules provided below. Instrument specific parameters are included in the FLM-QLT-GUI-001 Operations Guidance Document.

### Open-path UV Instrument Maintenance Schedule

Activity	Monthly	Quarterly	Annually
Visually inspect the system.	✓		
Confirm the alignment to verify there has not been significant physical movement. Note: this is automatically monitored as well.	✓		
Download data from detector hard drive and delete old files to free space, if needed.	✓		
Ensure there are no obstructions between the detector and the light source.	✓		
Verify system settings.	✓		
Clean optics on detector and retro reflector.	✓		
Realign system after service.	✓		
Check system performance indicators.	✓		
Check UV light source.			✓
Annual Service Check			✓



### Schedule of Maintenance Activities for the FTIR

Activity	Monthly	Annually
Visually inspect the system.	✓	
Download data from detector hard drive and if needed delete old files to free space.	✓	
Check system performance indicators.	✓	
Annual Service Check		✓

### Schedule of Maintenance Activities for the Organic Gas Detector

Activity	Monthly	Annually
Visually inspect the system.	✓	
Download data from detector hard drive and if needed delete old files to free space.	✓	
Check system performance indicators.	✓	
Annual Service Check		✓

## Section 6 – Document Control

Document Control will include the following elements

- Management and Organization
  - Quality Assurance Project Plan for Fence-Line Monitoring Program
  - Organizational chart
  - Personnel qualifications and training
  - Support contract
- Site Information
  - Site maps
  - Equipment registers
- Field work
  - SOPs
  - Field notebooks
  - Sample handling check sheets
  - Maintenance check sheets
  - QA check sheets
- Raw data
  - Description of raw data files generated by instruments
- Data Reporting
  - Realtime website
  - Monthly reports
- Data Management
  - Database structure
  - Data management flowchart
  - Database backup plan
- Quality Assurance
  - Site audits
  - Corrective action reports
  - System audits
  - Data quality assessments

## Section 7 – Website Management

The real-time Website is operated and maintained by the contractor who will be solely responsible for its content. This section addresses the methods used to provide information to the public including message board updates, notification of significant events, data reporting, learning center section, and a contact page.

### Message Board Updates

A message board on the real-time website is used to inform the public whenever an event such as gas detections above a preset level occurs, the Internet connection is lost, or an instrument fails to operate within normal parameters. If one of these or similar events occur, the message board will be updated by the contractor as soon as practical. A listing of the standardized messages and the timeframe in which they will be posted to the website are listed in FLM-QLT-GUI-001 Operations Guidance Document.

### Data Reporting

Data from the fence-line monitors will be transmitted to an internet website where the near-real-time results can be viewed by the public. Data generated by the fence-line monitoring equipment undergoes review throughout the measurement and reporting process. Included in this process is automated QA/QC checks that occur before data is reported on the real-time website. Under normal circumstances a 5-minute average measurement will appear on the website within 10 minutes of the end of the measurement period. However, the data uploaded may be impacted by internet traffic. An automated system conducts the Quality Assurance checks before the data is reported to the website. The website will also make available a rolling 24-hour trend of the 5-minute data for each gas reported.

Once QA/QC of the final data is completed within 60 days after the end of each calendar quarter, the refinery will provide one-hour average concentration data in tabular format through a comma separated value data file to the BAAQMD. The BAAQMD may make the one-hour average data available to the public through a BAAQMD website or through public records request. The refinery will make data available to BAAQMD upon request prior to the report submittal.

### Learning Center

Individuals will be able to access additional information pertaining to the fence-line program. This will include information about each target gas, a site map showing locations of fence-line equipment, Office of Environmental Health Hazard Assessment (OEHHA) health standards for target gases (if applicable), and links to the BAAQMD and CARB.

### Contact Section

Individuals will be able to send feedback to operators of the fence-line system.