

Temporary Amendment of Select Air Monitoring Directive Requirements

AEP Response to COVID-19

(Originally published April 1, 2020; **EXPIRES July 15, 2020**)

Background

Alberta Environment and Parks (AEP) recognizes the potential impact of the ongoing COVID-19 situation on industrial operations and Alberta airsheds and has decided to amend select Air Monitoring Directive (AMD) requirements on a temporary basis.

The intent of this interim policy is to alleviate potential pressures on industrial operations and airsheds while still ensuring Albertans and Regulators have access to quality assured air quality information. The amendments will allow impacted operators to focus resources on the most important issues, such as safety, instrument malfunctions and repairs.

The COVID-19 pandemic has the potential to impact the availability of station operators both directly and indirectly and this may lead to staff shortages and limit the capacity for on-site work.

Effective March 31, 2020, industrial operations and Alberta airsheds are able to deviate from select AMD monitoring, siting and reporting requirements as outlined below. Industrial operations should also consult the posted [ministerial order](#) pertinent to EPEA approval and registration holders.

Specific AMD requirement relaxation and duration

Continuous Ambient Monitoring Stations (AMD Chapters 3 and 7)

1. Reduced frequency of ambient continuous air monitoring station calibrations from monthly to quarterly (every 3 months). Therefore, calibration of ambient analyzers is now required once every 3 months for the remainder of 2020.
 - Applies to AMD Chapter 7, Cal 2-G(a) – multi point calibration of continuous gas analyzers and, where required, calibration of particulate monitoring instruments.
 - The reduction also applies to the following clauses, provided all other manufacturer requirements are met:
 - Cal 5-A(a) – requirement to calibrate through the inlet filter [waived to allow for remote calibrations for those stations configured to do so]; and
 - Cal 5-A(q) – replacement of analyzer inlet filter element [change to quarterly frequency].
 - In order for ambient air monitoring data to be considered valid and quality assured during any period of reduced calibrations, the existing calibration acceptance criteria must still be met:
 - Analyzer zero values must not exceed +/- 3% of the analyzer full scale calibrated range; and
 - Analyzer span values must not exceed +/- 10% for the target value established at the last routine multi-point calibration.

- All other routine quality-assurance activities must continue, including but not limited to:
 - Daily zero/span checks;
 - Daily diagnostic checks; and
 - Investigation of anomalous data.
 - Data must continue to be flagged as indicated in the AMD and associated Quality Assurance Plans.
 - **Effective immediately and extending until December 31, 2020.**
2. Reduced frequency of ambient continuous air monitoring station manifold and inlet cleaning from monthly to quarterly (every 3 months). Therefore, ambient station manifold and inlet cleaning is now required once every 3 months for the remainder of 2020.
- Applies to AMD Chapter 3:
 - SS 3-K – requirement for monthly sample inlet and manifold cleaning; and
 - SS 3-M, SS 3-N – requirements to clean continuous particulate monitor size selective inlets.
 - **Effective immediately and extending until December 31, 2020.**

Reporting (AMD Chapter 9)

3. Removal of requirement to report "calendar day" in AMD reporting forms.
- Applies to AMD Chapter 9 (reporting forms and Guidance on Common AMD Questions).
 - Production day can be reported, however industrial operations must include comments in AMD reporting form on what 24-hour interval is being reported.
 - Industrial operations who have already switched to reporting calendar day have the choice to remain or switch back to reporting production day. Again, this must be noted on the form comments section.
 - **Effective immediately.**
 - The department will look to re-engage industry on the alignment of daily reporting to ensure consistency and accuracy of data submitted.
4. Three-month extension for completion and submission of 2019 Annual Emissions Inventory Report (AEIR).
- Applies to AMD Chapter 9, RC 7-B and RC 7-F – deadline for completion of emissions inventory and submission of Annual Emissions Inventory Report.
 - **Effective immediately, 2019 AEIR reports which were due September 30, 2020 are now due December 31, 2020.**
5. Removal of requirement to immediately report exceedances of Ambient Air Quality Guidelines until August 31, 2020.
- Applies to AMD Chapter 9, RC 4-A and RC 14-A – requirement to immediately report ambient exceedances.
 - Industrial facilities and airsheds are not required to call in exceedances of Ambient Air Quality Guidelines (e.g., hourly fine particulate matter guideline).
 - Industrial operations and airsheds are still required to report exceedances of guidelines in their monthly air monitoring summary reports.
 - Industrial operations and airsheds must still immediately report exceedances of Ambient Air Quality Objectives and complete any other immediate reporting required under an approval and the Substance Release Regulation.
 - **Effective immediately and extending until September 30, 2020.**
6. Two-month extension for submission of airshed monthly air monitoring summary reports and ambient data.
- Applies to AMD Chapter 9:
 - RC 13-B and RC 13-C – deadline for submission of ambient data;
 - RC 15-C and RC 15-D – deadline for monthly report submission.
 - Includes airshed reports, ambient XML data files, ambient calibration and lab certification reports.
 - This extension does not apply to the submission of real-time data used for reporting the AQHI. Real-time ambient data must continue to be reported on an hourly basis.
 - **Effective immediately and extending until September 30, 2020.**
 - March reports due June 30, 2020; April reports due July 31, 2020; May reports due August 31, 2020; June reports due September 30, 2020.

Additional guidance

While calibration requirements have been amended for industrial and airshed continuous ambient monitoring, it is critical that the data evaluation, acceptance criteria, and processes for determination of quality assurance remain in place.

Timelines for report submission have been extended for airsheds, however the content of reports, forms or data submission files must still follow AMD requirements.

Amendments to reporting requirements for industrial operation is provided in a [ministerial order](#) for EPEA approval and registration holders.

Calibration deviations described above must be documented in the airshed monthly report.

The temporary amendments in this document expire on July 15, 2020.

Any comments, questions, or suggestions regarding the content of this document may be directed to:

AMDFeedback@gov.ab.ca

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EXPIRES: July 15, 2020

AMD Requirements

Air monitoring and reporting requirements are provided on the AMD Website:

<https://www.alberta.ca/air-monitoring-directive.aspx>