

Air Monitoring Directive – Summary of Feedback and Responses for Chapter 1

January 31, 2014

The following feedback was received following the 60-day public review of the Air Monitoring Directive Chapter 1, June – July 2013. In many cases the content or concerns expressed in comments received were similar, and only one of the representative comments has been included for a reply.

Chapter 1: Introduction			
#	Comment	Reply	Action Taken
1	<p>This will be the 3rd major revision of the AMD. The Introduction 2.0 What is the Air Monitoring Directive states that the AMD is comprised of the AMD – 1998, 2006 amendments to the 1989 AMD and Chapter 1 AMD Introduction. This does not include Chapter 2 Ambient Air Monitoring Program Planning and a provision for future chapters.</p> <p>These revisions are mainly directed towards airsheds specifically, they may not always be applicable to other approval holders required to monitor ambient air.</p>	<p>Chapter 2 Ambient Air Monitoring Program Planning will be added as a Chapter of the AMD.</p> <p>As chapters are finalized, they will be listed in Chapter 1 AMD Introduction.</p> <p>Chapter 2 is specifically for monitoring organizations i.e. airsheds (refer to the definition in Chapter 1). Other chapters being revised will apply to airsheds as well as approval holders.</p>	<p>Added Monitoring Planning (Chapter 2) to the list of current AMD chapters in the AMD Introduction (Chapter 1).</p>
2	<p>Purpose: The first sentence is unclear. The phrase “for source air emissions and ambient air quality” could be clarified to ensure upfront that all “person’s responsible” for air quality monitoring and reporting are identified as affected by this directive.</p> <p>The purpose is clearly stated. However, it should be clarified that this directive does not address how the monitoring data collected through this directive is to be used by decision-makers. It might be stated that how the data is to be used to affect adaptive management or cumulative effects management is addressed in another document.</p>	<p>Agree that first sentence could be more general and all encompassing. Purpose section also defines who the AMD applies to (person responsible) in Clause Int 1-A.</p> <p>Agree this Directive does not dictate how data and reports will be used. Should be inherent, since this is not defined as the purpose of the AMD. AMD dictates the how/when/what of monitoring and reporting.</p>	<p>Changed first sentence to: Alberta’s Air Monitoring Directive (AMD) sets out the requirements for monitoring and reporting requirements for source air emissions and ambient air quality in the province in Alberta.</p> <p>Will leave purpose as it is currently stated.</p>
3	<p>With respect to the Review and Revision of the Directive and the sentence: “The public will have the opportunity to review draft chapters and provide comments to the Department” - the province needs to clarify who they mean by the public. For example, has the general public been invited to comment on these amendments?</p>	<p>All chapters of the AMD will be posted for a 60-day public comment on the ESRD web site. All Albertans are free to provide comments.</p> <p>No, there is no active invitation to the public, but anyone who visits the website is able to comment.</p>	<p>Changed to “interested stakeholders will have the opportunity to review ...”</p>

4	It would be preferable to have one complete document rather than a number of different documents to reference and comply with. This would simplify issues and reduce the risk of non-compliance due to confusion.	When the AMD has been completely revised, a complete document will be produced. This is why the chapters are numbered in a consecutive way. Final document will be very large and may not be conducive to one PDF, but will be formatted so that chapters can be printed out as one document if desired.	No change necessary.
5	Section 1.0 second bullet – monitoring sties – correct spelling of site	Agreed	Change made.
6	How is air data used to assess the quality of land or water?	Please note the statement says “ <i>data users rely on environmental data to: assess the quality of air, land and water</i> ” the statement does not indicate air data is used to assess the quality of land or water. An example is acid deposition analysis (dry deposition/acidic particles) – concentrations compared to the loading capacity of soil and water bodies.	No change necessary.
7	Pg 1. Consider providing flexibility to accommodate conflicting requirements and to allow approved trials of alternative methods. Rationale: Although it is not desirable, there could be at least a transition period when data will be reported to AESRD and to another organization, which might specify other methods.	Currently data is reported to ESRD. If this changes in the future, the AMD would need to be revised (as would approvals).	No change necessary.
8	Consider revising definitions to include those persons in Int 1-A or clarify what requirements of the AMD apply to the persons responsible.	Int 1-A states that requirements of the AMD apply to the person responsible unless there is a statement that changes this. (e.g. Chapter 2 – Monitoring Planning applies only to monitoring organizations/airsheds). The definitions include “monitoring organization” the other people mentioned are self-evident.	Changed definition of monitoring organization so that it is clear that it does not pertain to industrial organizations, rather only to monitoring collectives.
9	pg 5, Alberta’s Ambient Air Quality Data Warehouse Does this replace the CASA Data Warehouse? Is the final destination for all monitoring data? Is it aligned with Environment Canada requirements for JOSM data?	This is a generic name for the CASA Data Warehouse. Yes, it is the final destination for all air data.	Revised definition slightly to include that this is online and available to the public.
10	Continuous, inspection and invalid data are definitions included in the	The definitions in the CEMS code are specific to	No change made.

	<p>CEMS Code but are not defined the same. for consistency purposes, consider redefining to match those definitions.</p> <p>(20) Continuous – note that this definition is different from the CEMS code and may lead to confusion.</p> <p>(48) Invalid data – again this is different from the CEMS code and may lead to confusion.</p>	<p>continuous emission monitoring. Definitions in the AMD will remain as is as they are specific to ambient monitoring. This will not change the meaning of the CEMS Code as definitions in the Code will take precedence.</p>	
11	<p>Definition for Controlled documents = if the intent of this definition is for authorization to be from within the group/organization, consider redefining to specify that the authorization is needed within the group/organization, not authorization from the Director.</p>	<p>Yes, this refers to <i>internal</i> authorization.</p>	<p>Changed definition to clarify that authorization is internal to the organization.</p>
12	<p>definition “uncertainty of measurement” Suggested: “<i>uncertainty of measurement</i>” is a parameter associated with the result of a measurement that characterizes the dispersion of values that could reasonably be attributed to quantity being measured;</p>		<p>Changed definition to “...reasonably be attributed to the actual value being measured.”</p>
13	<p>(51) Monitoring organization - Listing the specific current Airshed zones in the document might not be advisable in terms of maintaining the document in the future.</p> <p>Also, as currently stated, the definition seems highly focused on regional Airshed zones, however it is unclear who would form the “monitoring organization” for a compliance monitoring network or for an entity outside of a current Airshed zone. Are adjacent or regional Airshed zones included in compliance ambient network planning? Should ESRD be listed in the definition also?</p> <p>(51) Monitoring Organization – is specific to airsheds. Is the intent that the AMD and this revision is only intended for airsheds?</p>	<p>The definition of monitoring organization was intended to bring airsheds into the AMD, since they were not included in the 1989 AMD. The Ambient Monitoring Planning chapter (Chapter 2) of the revised AMD is applicable only to airsheds. The entire AMD is applicable to all parties monitoring air quality and reporting to the Department.</p>	<p>The term “monitoring organization” was changed to “Alberta airshed” to be more clear.</p>
14	<p>The confidentiality of production data when submitted with monthly reports, the draft of Part 3.0 of Chapter 1 (Introduction) of the new AMD doesn’t explicitly deem production data as confidential, and indicates confidentiality must be specifically requested in writing with justification for Director review. It is our opinion that production data should by default remain confidential as it was in the ’89 AMD. Without this</p>	<p>The 2006 amendment to the 1989 AMD repealed and replaced the 1898 AMD Introduction, where the Confidentiality of Data section resided. Data confidentiality is now covered by EPEA Section 35 – Disclosure of information. (4) Where information referred to in subsection (1)</p>	<p>Removed details on confidentiality in this section and just refer to EPEA Section 35.</p>

	caveat, industry members will be required to unnecessarily submit written requests for confidentiality	<i>or (3) is provided to the Department and relates to a trade secret, process or technique that the person submitting the information keeps confidential, the person submitting the information may make a request in writing to the Director that the information be kept confidential and not be disclosed.</i>	
15	Clause 1.1.1 of the 2006 Amendments to the Air Monitoring Directive, 1989 specified that the “requirements of the Directive apply to all environmental air monitoring data that are: (a) Required by an EPEA Approval...” The wording of this clause led to inclusion of air monitoring data from source and fugitive emissions programs in addition to ambient air monitoring in the development of our Quality Assurance Plan. With the repeal of this clause (Int 2-F) and the descriptive text (similar to the excerpt from 1.1.1) now provided in 1.0 Introduction, is the expectation of ESRD to focus the AMD primarily on ambient air monitoring?	Clause 1.1.1 will be repealed and replaced by Chapter 1 (AMD Introduction). The new clause Int 1-A replaces this and covers all air monitoring, source and ambient: <i>Int 1 A Unless otherwise specified, the requirements of the AMD apply to the person responsible, which includes: a) the owner of a facility that is the subject of an approval or other authorization under the Environmental Protection and Enhancement Act; b) the holder of an approval or other authorization under the Environmental Protection and Enhancement Act; c) the Alberta airshed; or d) any other person specified in any other part of the AMD.</i>	No change necessary.
16	(64) “ppb” parts per billion is defined, but “ppm” parts per million and other applicable units of measure are not included in this chapter.	Only those terms used in the revised AMD text are included in the list of definitions in the AMD Introduction chapter. This list will be amended as new chapters of the AMD are added (ppm will be added if the term is used).	No change necessary. Parts per million will be added when it is used in one of the revised chapters of the AMD.
17	(62) “PM10” means coarse particulate matter (airbourne particles between 2.5 and 10 microns);		Change made.
18	The definition of “should, may” is ambiguous and should be re-phrased to ensure clarity. In previous versions, the succinct definition, “the	These definitions were taken from EPEA, however these definition do not appear in the 2013	Changed definitions back to 2006 definitions for shall, must, should,

	element is recommended,” had been used.	amendment.	may.
19	Definitions (Page 10) – For the definition of “SDWD” depending on how it is referenced in the AMD you may wish to include an averaging time or range of averaging times e.g. “The Standard Deviation of Wind Direction over a 1 to 3 hour period based on 5 minute wind direction measurements” .	This is defining the acronym not providing any requirements around that parameter.	No change made.
20	The definitions for particulate matter should read as follows: <ul style="list-style-type: none"> • “PM10” means coarse particulate matter (airborne particles with diameters less than 10 microns) • “PM2.5” means fine particulate matter (airborne particles with diameters smaller than 2.5 microns) 	Different opinions on spelling of “airborne”.	Spelling corrected to read “coarse” and “airborne”.
21	Definitions (Page 8) – “PM10” should be defined as “Inhalable particulate matter (airborne particles less than 10 microns)” The definition given for PM10 is actual the definition for PM10-PM2.5;		Definition for PM 10 changed to: particulate matter (airborne particles) smaller than 10 micrometers in diameter.
22	definition “analyzer drift” Definition is unclear. Suggest: <i>Means a gradual increase or decrease in analyzer output for a fixed input over a period of time.</i>		Definition changed to: means a gradual increase or decrease in analyzer output over a period of time.
23	definition “anomalous” A more common meaning is “incongruous or inconsistent with expected data”		Definition changed to: data that are incongruous or inconsistent with data expected for a particular that do not appear representative of the time or place.
24	definition “spans” Suggested: <i>“Span” means the difference between the measured concentration at 100% instrument output and that at 0% instrument output.</i>		Definition changed to: an instrument’s output range, from minimum to maximum scale value.
25	definition “ambient” Confused by the comment “to which the general public has access” in the context of air monitoring (Is the intention to exclude monitoring on lease?)		Removed “to which the general public has access to” from definition.
26	1. Application of the AMD (page 2) – The AMD should also apply to: a. the owner of a facility that is the subject of an approval or other authorization under the Responsible Energy Development Act;		Legal will work on making the distinction between agencies from the broader context of all ESRD policies,

	<p>b. the holder of an approval or other authorization under the Responsible Energy Development Act. Source and ambient air monitoring needs to be consistent throughout the province regardless of the agency actually responsible for regulating the emitter/emissions.</p>		<p>approvals, etc.</p>
27	<p>Section 2.2 The list of amendments is lengthy and will be difficult to maintain. If AESRD could publish a compendium of the current revisions rather than a lengthy list of repealed and replaced sections, subsections or clauses, that would be easier to follow.</p>	<p>Introduction chapter will not contain all AMD amendments – only those relevant to the Introduction chapter. Separate documents/tables for each chapter will be made to show amendments. Introduction chapter will only list the components that currently make up the AMD, and this list will be amended as new chapters are released.</p>	<p>No change made.</p> <p>AMD website has a “correlation table” which shows where previous requirements from the 1989 and 2006 requirements are now found in the revised 2014 AMD</p>