

Wyoming Department of Environmental Quality – Air Quality Division



WYOMING DEPARTMENT OF
ENVIRONMENTAL
QUALITY

Quality Assurance Project Plan for the Total Hydrocarbon Compounds (THC) Ambient Air Monitoring Program

November 2025
Revision 4

Section A. Project Management

1.0 Quality Assurance Project Plan Identification and Approval

Title: Wyoming Department of Environmental Quality, Air Quality Division (WDEQ-AQD) Quality Assurance Project Plan (QAPP) for Total Hydrocarbon Compounds Ambient Air Pollution Monitoring Program.

This QAPP for the Total Hydrocarbon Compounds (THC) Ambient Air Quality Monitoring Program is hereby recommended for approval and commitment from the Department to follow the elements described within.

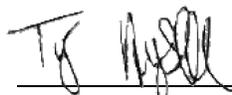
Wyoming Department of Environmental Quality, Air Quality Division



Air Pollution Monitoring Program Supervisor, Leif O. Paulson

11/24/2025

Date



Quality Assurance Coordinator, Ty Hysell

11/26/2025

Date



Air Pollution Monitoring Program Manager, Mark R. Gagen

11/24/2025

Date

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Acronyms

AGL	Above Ground Level
AMTIC	Ambient Monitoring Technology Information Center
APE	Annual Performance Evaluations
APMP	Air Pollution Monitoring Program
APTI	Air Pollution Training Institute
AQD	Air Quality Division
AQRM	Air Quality Resource Management
AQS	Air Quality System
ASQ	American Society for Quality
AWMA	Air & Waste Management Association
BTEX	Benzene, Toluene, Ethyl-Benzene and Xylene
CFR	Code of Federal Regulations
CH ₄	Methane
C ₃ H ₈	Propane
DAS	Data Acquisition System
DQIs	Data Quality Indicators
DQOs	Data Quality Objectives
E-log	Electronic Logbook
EPA	U.S. Environmental Protection Agency
FID	Flame Ionization Detector
GC	Gas Chromatography
HVAC	Heating, Ventilation, and Air Conditioning
IMPACT	Inventory, Monitoring, Permitting, and Compliance Tracking
IMS	Industrial Monitoring Stations
IP	Internet Protocol
MFC	Mass Flow Controller
MQOs	Measurement Quality Objectives
NAAQS	National Ambient Air Quality Standards
NPAP	National Performance Audit Program
NIST	National Institute of Standards and Technology
NCore	National Core Air Measurement Network
NMHC	Non-Methane Hydrocarbon Compounds
OAQPS	Office of Air Quality Planning and Standards
PEs	Performance Evaluations
PEP	Performance Evaluation Program
PID	Photo Ionization Detector
PQAO	Primary Quality Assurance Organization
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality Control
QMP	Quality Management Plan
SLAMS	State and Local Air Monitoring Stations
SLT	State/Local/Tribal
SOP	Standard Operating Procedure
SPMS	Special Purpose Monitoring Stations

THC	Total Hydrocarbon Compounds
TTP	Through-the-Probe
URL	Upper Range Limit
WAAQS	Wyoming Ambient Air Quality Standards
WDEQ	Wyoming Department of Environmental Quality

3.0 Distribution List

The following individuals listed in Table 1 have been provided a copy of this Quality Assurance Project Plan (QAPP).

Table 1. QAPP Distribution List

Wyoming Department of Environmental Quality – Air Quality Division	
Name	Position
Amber Potts	Administrator
Mark Gagen	Air Pollution Monitoring Program Manager
Leif Paulson	Air Pollution Monitoring Supervisor
Ty Hysell	Quality Assurance Coordinator
Jacob Berreth	CEMS/SLAMS Coordinator
Lauren Deverse	Exceptional Events Analyst/Project Manager
Ardyss Thai	Data Manager
Jack Kokkinen	Project Manager
Grayson Rotter	Project Manager
Jackson Sansone	Project Manager
Paul Bailey	Monitoring Specialist
Trevor Hale	Monitoring Specialist
EPA Region VIII	
Name	Position
Joshua Rickard	Wyoming Monitoring Contact
YeChan Lim	Supervisor, Monitoring and Program Support Section

4.0 Project/Task Organization

Since the early 1970s, the Air Pollutant Monitoring Program (APMP) has been committed to monitoring the air quality of Wyoming with the goal of protecting, conserving, and enhancing the quality of Wyoming's environment for the benefit of current and future generations. The APMP provides the WDEQ-AQD with valuable information that allows for the determination of future policy considerations.

The WDEQ-AQD plans, operates, and maintains a number of different types of ambient monitoring stations, including National Core (NCore), State and Local Air Monitoring Stations (SLAMS), Special Purpose Monitoring Stations (SPMS), Interagency Monitoring of Protected Visual Environment (IMPROVE) monitoring stations, and Industrial Monitoring Stations (IMS).

The SLAMS are sited in populated areas to monitor public health and demonstrate compliance with the National Ambient Air Quality Standards (NAAQS) but may serve other purposes, such as:

- Providing air pollution data to the general public in a timely manner
- Supporting compliance with air quality standards and emissions strategy development
- Supporting air pollution research studies

The SPMS collectively have multiple objectives. These objectives include:

- Providing air pollution data to the general public in a timely manner
- Monitoring public health
- Investigating pollutant concentrations downwind of sources
- Determining background pollutant concentrations

Since 2011, the WDEQ-AQD has operated a fleet of mobile monitoring stations ("mobile stations") to investigate questions or concerns about air quality on a short-term basis (typically one year).

Additionally, the WDEQ-AQD administers an NCore station as part of the national network to evaluate long-term trends in air quality. The IMS are independently operated stations that meet the requirements of their permits. Although WDEQ-AQD has oversight authority for the permit-required monitoring networks, the IMS operate as independent Primary Quality Assurance Organizations (PQAOs).

The WDEQ-AQD is committed to quality and the implementation of the procedures and practices found in this QAPP. Quality assurance (QA) is an integrated system of management activities involving planning, implementation, assessment, reporting, and quality improvement to ensure that a process, item, or service is of the type and quality needed and as expected. Quality control (QC) is the overall system of technical activities that measures the attributes and performance of a process, item, or service against defined standards to verify that they meet the stated requirements established by the customer. The QC system includes the operational techniques and activities that are used to fulfill requirements for quality.

Quality control is largely implemented through the QAPP and the standard operating procedures (SOPs). Each instrument in the various monitoring programs have unique requirements, statutory standards, and support equipment that must be in place for the instrumentation to be operated according to the guidelines, rules, and policies that must be followed. This QAPP incorporates the unique qualities that are specific to total hydrocarbons (THC) analysis for the WDEQ-AQD network.

Implementation of the WDEQ-AQD monitoring program requires investment by the entire management team all the way to the APMP Manager. WDEQ-AQD management recognizes and accepts this responsibility

to identify the QA requirements that will meet the needs and expectations of the monitoring program. Any worthwhile monitoring program focuses on preventing quality problems.

Since the WDEQ- AQD has an overarching Quality Management Plan (QMP) in place, this and all QAPPs will be mandated by the WDEQ- AQD QMP. The QMP describes the quality system in terms of the organizational structure, functional responsibilities of management and staff, lines of authority, and required interfaces for those planning, implementing, assessing, and reporting activities involving environmental data operations.

The following sub-sections describe the project participants and roles and responsibilities of each participant. Figure 1, which is in the last portion of this section, illustrates that management structure.

4.1 Air Pollution Monitoring Program Manager

The APMP Manager has overall responsibility for managing the WDEQ-AQD according to WDEQ policy. The direct responsibility for assuring data quality rests with line management. Ultimately, the APMP Manager is responsible for establishing QA policy and for resolving QA issues identified through the QA program.

Major QA related responsibilities of the APMP Manager include:

- Participating in the budget and planning processes.
- Assuring that the WDEQ-AQD develops and maintains a current and germane quality system.
- Assuring that the WDEQ-AQD develops and maintains current QAPPs.
- Assuring adherence to the QA documents by staff and, where appropriate, other extramural cooperators establishing policies to ensure that QA requirements are incorporated in all environmental data operations.
- Maintaining an active line of communication with the APMP Supervisor, QA Coordinator, and Project Managers conducting management systems reviews.

The APMP Manager delegates the responsibility of QA development and implementation in accordance with WDEQ policies. Oversight of the WDEQ-AQD's QA program is delegated to the Quality Assurance Coordinator.

4.2 Air Pollution Monitoring Program Supervisor

The APMP Supervisor is the delegated manager of the routine monitoring programs, which includes the QA/QC activities that are implemented as part of normal data collection activities.

Responsibilities of the APMP Supervisor include:

- Communicating with EPA Project Officers and QA Personnel regarding sampling and quality assurance activities.
- Understanding EPA monitoring and QA regulations and guidance to ensure subordinates understand and follow the regulations and guidance.
- Understanding the WDEQ-AQD's QA policy and ensuring subordinates do as well.
- Understanding and ensuring adherence to the QAPP.
- Reviewing acquisition packages (contracts, grants, cooperative agreements, and interagency agreements) to determine the necessary QA requirements.
- Developing budgets and providing program costs necessary for EPA allocation activities.
- Ensuring that all personnel involved in environmental data collection have access to any training or QA information needed to be knowledgeable in QA requirements, protocols, and technology.
- Certifying to EPA that data are precise, accurate, and representative.

4.3 Quality Assurance Coordinator

The QA Coordinator is the delegated manager of the WDEQ-AQD's QA Program. The QA Coordinator has direct access to the Administrator, APMP Manager, and APMP Supervisor on all matters pertaining to quality assurance. The QA Coordinator's main responsibility is QA oversight and ensuring that all personnel understand the WDEQ-AQD's QA policy and all pertinent EPA QA policies and regulations specific to the APMP. The QA Coordinator provides technical support and reviews and approves QA products.

Responsibilities include:

- Developing and interpreting WDEQ-AQD QA policy and revising it as necessary.
- Developing a QA Annual Report for the Administrator.
- Assisting Contractors and Project Managers in developing QA documentation and providing answers to technical questions.
- Ensuring that all personnel involved in environmental data operations have access to any training or QA information needed to be knowledgeable in QA requirements, protocols, and technology.
- Ensuring that environmental data operations are covered by appropriate QA planning documentation (e.g., QA project plans, data quality objectives, etc.).
- Ensuring that reviews, assessments, performance evaluations and audits are scheduled and completed and, if needed, conducting or participating in QA activities.
- Tracking the QA/QC status of all programs.
- Recommending required management-level corrective actions.
- Uploading QA/QC data to the EPA's Air Quality System (AQS), which is the National database for all air pollution and meteorological data.
- Serving as the program's QA liaison with EPA Regional QA Managers or QA Officers and the Regional Project Officer.

The QA Coordinator has the authority to carry out these responsibilities and to bring to the attention of the APMP Manager any issues associated with these responsibilities. The QA Coordinator either performs or delegates the responsibility of QA development and implementation.

4.4 Project Managers

Project Managers are responsible for project coordination; oversight of contractor activities; maintaining the official, approved QAPP; and QAPP distribution. Responsibilities include:

- Ensuring the day-to-day operation and upkeep of all monitors are maintained.
- Overseeing data processing, reporting, and assuring data collection are performed in a timely fashion.
- Understanding EPA monitoring, QA regulations and guidance, and ensuring Contractors, Monitoring specialists, and Site Operators understand and follow those standards.
- Understanding WDEQ-AQD QA policy and ensuring subordinates understand and follow the policy.
- Understanding and ensuring adherence to the QAPP as it relates to program support activities.
- Participating in the development of data quality requirements with the appropriate QA staff.
- Writing and modifying QAPPs and SOPs.
- Verifying that all required QA activities were performed and quality standards were met as required in the QAPP.

4.5 Monitoring Specialists

The Monitoring Specialist (field personnel), either WDEQ-AQD or contractors are responsible for carrying out required tasks and ensuring the data quality results of the tasks by adhering to the guidance and protocols specified by the QAPP and SOPs for the field activities. Responsibilities include:

- Participating in the implementation of standards, as laid out in the QAPP.
- Keeping up-to-date in training and certification activities.
- Verifying that all required QA activities are performed and quality standards are met (as required by the QAPP).
- Following manufacturer specifications for any equipment used.
- Documenting deviations from established procedures and methods.
- Reporting all problems and corrective actions to the Contractor and Project Manager.
- Preparing and delivering reports to the Project Manager.
- Assessing and reporting on data quality.

4.6 Site Operators

The Site Operators visit the monitoring station once a month. The Site Operator's role is to do the routine maintenance on the monitoring station and instrumentation. For the purpose of this THC QAPP, the Monitoring Specialist can perform the duties of the Site Operator. Responsibilities include:

- Change in-line filters on the continuous instruments (monthly).
- Perform unexpected tasks such as run a manual calibration (if necessary after a repair).
- Replace electronic or pneumatic components at the direction of a Contractor or Project Manager.
- Reporting all problems and corrective actions to the Contractor or Project Manager.
- Thoroughly documents all activities performed at a station and reports activities and results to the Contractor and Project Manager.
- Assessing and reporting on data quality.

4.7 Data Manager

The Data Manager reports to the APMP Manager and is in charge of the WyVisNet website and the AirVision data management system, which runs WyVisNet. Responsibilities include:

- Methane (CH₄), Non-Methane Hydrocarbon Compounds (NMHC), and THC data are not uploaded to the EPA's Air Quality System (AQS), but their fully validated data are provided to the WDEQ-AQD in AQS-formatted files.
- Ensures data are move to/from the IMPACT system and shared drives per our WDEQ Records Management Plan
- Performs data queries within the central database in Cheyenne headquarters
- Works with the vendors that supply and maintain the WyVisNet software system
- Performs data analyses as described in Sections 22 and 23 of this QAPP.

Please note that an annual review of the QAPP will be performed and, if no changes are needed, the WDEQ-AQD will document that no changes were necessary. If changes are required, revised pages with the revisions will be inserted/changed, revisions will be tracked, and a new revision number will be assigned to the document.

Figure 1 illustrates the organization structure for the WDEQ-AQD. For a list of project participants, please see Appendix B.

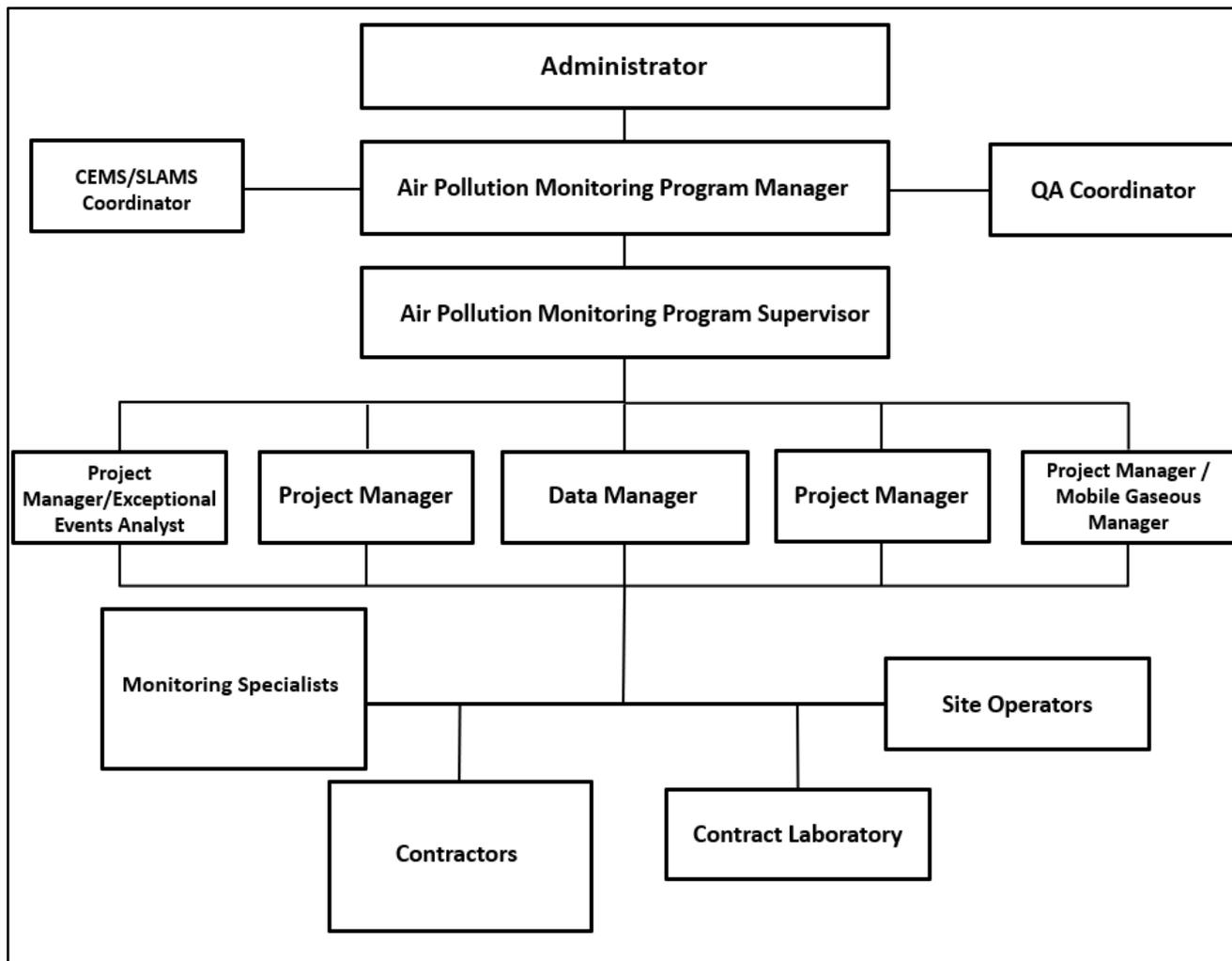


Figure 1. WDEQ-AQD Organization Chart

5.0 Problem Definition/Background

This QAPP pertains strictly to the collection and analysis of CH₄, NMHC, THC and their species within the State of Wyoming and details the methodologies to establish precise and accurate THC measurements at all stations within the WDEQ-AQD network, regardless of the type of monitoring that is performed. For clarity, the term “THC” will be defined as the total hydrocarbon species that include the following compounds or collection of compounds:

- CH₄: Methane, which is the simplest hydrocarbon species. It is the dominant species in the atmosphere
- NMHC: Non-methane hydrocarbon compounds, this is the total of all atmospheric hydrocarbons (other than CH₄) that have low boiling points and are volatile in most atmospheric conditions. The CH₄/NMHC analyzer measures these compounds and differentiates between CH₄ and the rest of the volatile organics as NMHC. For this document, THC = CH₄ + NMHC
- BTEX: This term refers to a group of simple mono-cyclic hydrocarbons, i.e., Benzene, Toluene, Ethylbenzene and Xylene. These compounds are volatile organic compounds (VOCs), which are photochemically active (i.e., have a role in the formation of ozone and fine particles) and in the case of Benzene, is carcinogenic.

The objective of the THC monitoring network is to provide the necessary information for developing a representative air quality data set capable of delineating differences among geographical and climatological regions. The monitored data are used to characterize and monitor trends in air quality and air quality standards' compliance, and may be used for national health assessments, model evaluations, and comparison with other ambient air monitoring data. The procedures outlined in this QAPP have been developed to meet the goals and objectives of the monitoring project. Revisions to the QAPP are made, as necessary, to reflect changes to the regulations or goals of the monitoring project. As a minimum, the QAPP is reviewed annually and revisions are made as necessary.

The WDEQ-AQD currently operates nine (9) monitoring stations for CH₄/NMHC and one (1) for BTEX. At this time, there is no NAAQS or WAAQS primary or secondary standard for THC or any of its species. However, measurement of THC is very important to understanding the photochemical nature of the atmosphere. Please note that the Boulder Station operates both a CH₄/NMHC analyzer and BTEX analyzer. Figure 2, on the next page, shows a map of present CH₄/NMHC monitoring stations

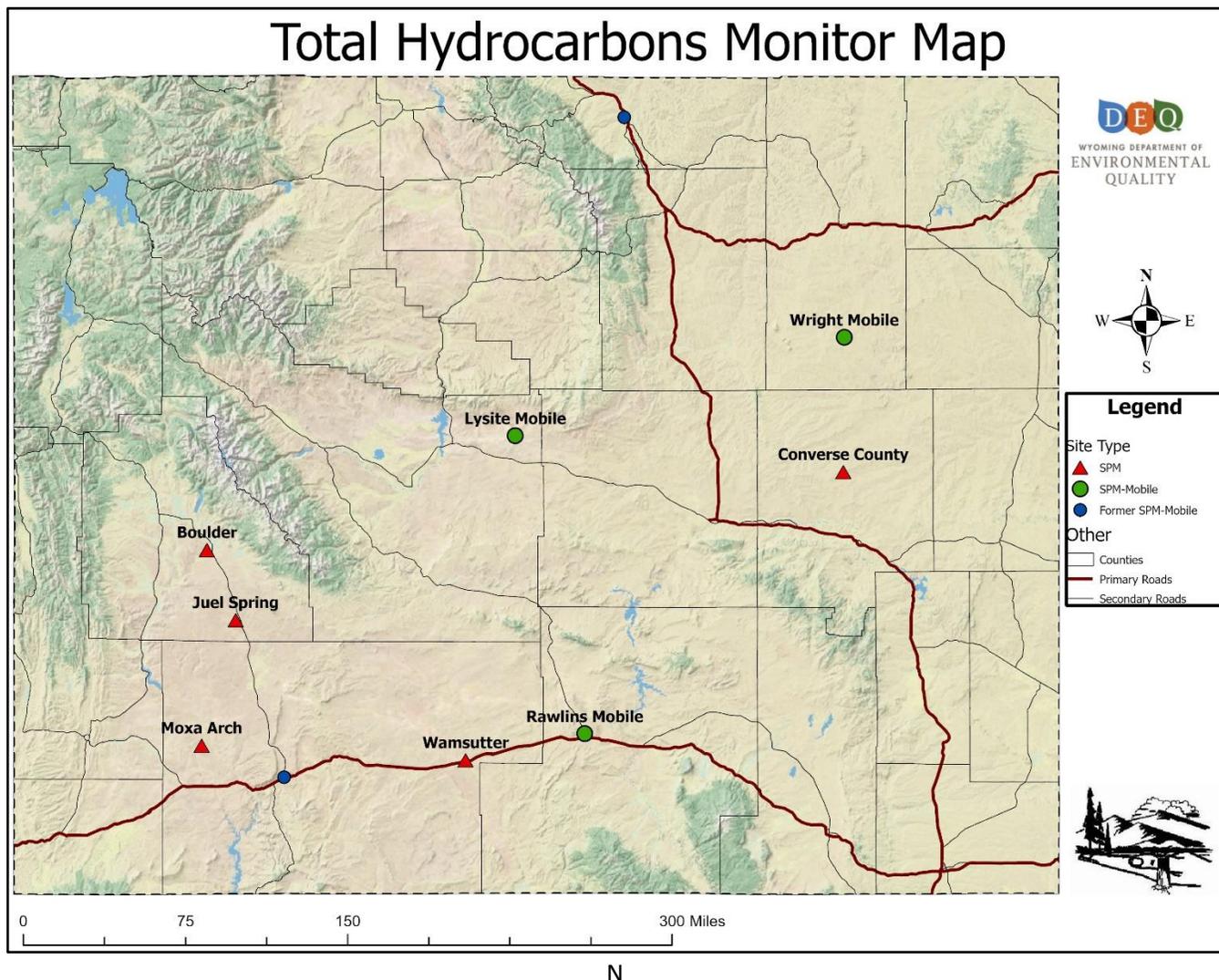


Figure 2. THC Site Locations, 2025

5.1 Supporting Documentation

The information collected for this monitoring program will meet the requirements as found in the following documents:

- Quality Assurance Handbook for Air Pollution Measurement Systems, Volume II: Ambient Air Quality Monitoring Program, EPA-454/B-17-001, January 2017².
- Technical Assistance Document for Precursor Gas Measurements in the NCore Multi-Pollutant Monitoring Network, Version 4, EPA-454/R-05-003 September 2005³
- EPA's Quality Assurance Handbook for Air Pollution Measurement Systems, Volume I: Principles⁴
- Technical Assistance Document for Sampling and Analysis of Ozone Precursors for the Photochemical Assessment Monitoring Stations Program, EPA Document EPA-454/B-19-004, April 2019⁵

The guidance presented in the above listed documents is to be followed for this monitoring program is intended to ensure that data and technical information that are measured are of documented and of appropriate quality and usability.

6.0 Project Task Description

6.1 THC Measurements

CH₄/NMHC analyzers use a flame ionization detector (FID) in conjunction with an oxidation catalyst switched in and out of the sample stream. The catalyst oxidizes the THC except CH₄ to produce a CH₄ only measurement. The catalytic reaction relies on the presence of oxygen in the sample. The CH₄ value is then subtracted from the THC concentration to determine the NMHC reading. Output of the instrument is three channels: CH₄, NMHC and THC. These values are sent to the data acquisition system (DAS) that stores the data.

The THC analyzers operated in the WDEQ-AQD network provide fast data handling and highly reproducible results. Errors commonly associated with catalyst characteristics have been eliminated providing an extremely stable and accurate signal.

In addition, a BTEX analyzer is operated at one location in the WDEQ-AQD network. The BTEX analyzer is an on-line gas chromatograph (GC) that measures direct, continuous, real-time measurement of BTEX. Although the analyzer can differentiate other VOCs, these compounds are of the most interest to the WDEQ-AQD. The BTEX analyzers combine the GC technology with a photoionization detector (PID), which are highly sensitive to the BTEX compounds.

6.2 Sampling Frequency

Data from the THC instruments are sampled once every minute by the Data Acquisition System (DAS). The DAS stores the data in 1-minute and hourly increments (at a minimum). This data is then transmitted and reviewed by WDEQ-AQD or contractor staff on a defined interval at their central location.

6.3 Project Schedule

Personnel working on this project are fully qualified, trained, and capable of performing their assigned duties. Work schedules include: daily data review; quarterly and semi-annual air quality equipment calibrations, quarterly data reports within sixty (60) days of quarter completion; annual reports within ninety (90) days of year completion; and maintenance and corrective action.

6.4 Project Reports

Table 2 presents the reports that will be produced as part of this project.

Table 2. Project Reports

Reports	Frequency	Content	Responsible Position
Quarterly Data Reports	Quarterly	Summarizes data following EPA guidelines, includes accuracy and precision	Contractor with review by Project Manager
Annual Data Report	Annually	Summarizes data following EPA guidelines	Contractor with review by Project Manager
Performance Audit Reports*	Semi-annually	Summarizes audit results following EPA guidelines	WDEQ-AQD QA Coordinator or Contractor with review by Project Manager
Corrective Action Reports	As Needed	Summarizes corrective actions taken to return the monitoring station to compliant status	Contractor with review by Project Manager
Response to Corrective Action Reports	As Needed	Reports the results of the corrective actions taken	Contractor with review by Project Manager

*Boulder and Cheyenne NCore are audited quarterly.

7.0 Quality Objectives and Criteria for Measurement of Data

This section discusses the Data Quality Objectives (DQOs), the Measurement Quality Objectives (MQOs) and Data Quality Indicators (DQIs) that are mandatory for all monitoring programs.

Generally, the DQOs for any program are created by the stakeholders. The DQO process is a seven-step decision tree that allows the stakeholders for the WDEQ-AQD to define parameters for the program. The DQO process has been in existence for many years, first by the EPA and then utilized by the State, Local and Tribal governments that are required to collect data on behalf of the EPA.

As mentioned before, the DQO is a seven-step process that takes the form of a discussion of the important aspects of the program. It is encouraged and useful that the DQO process be performed from time to time to ensure that the objectives are clear and concise.

7.1 The DQO Process

On August 12, 2020, the WDEQ-ADQ and its Contractor met to discuss the DQOs for the programs and define the objectives. Table 3 below outlines the discussion and the outputs of the DQO process in each step.

In order for the DQOs to be fulfilled, MQOs are designed to evaluate and control various phases (sampling, preparation, and analysis) of the measurement process to ensure that total measurement uncertainty is within the range prescribed by the DQOs. MQO's can be defined in terms of the following DQIs: precision, bias, representativeness, detectability, completeness, and comparability.

Table 3. DQO Seven Step Decision Tree Process

DQO Step	Output to Discussion by Decision Makers
<p>Step 1. State the Problem</p>	<p>The State of Wyoming, being within the bounds of the United States, must adhere to the Clean Air Act Amendments. The Code of Federal Regulations 40 Part 50 set the NAAQS and the State of Wyoming measures for the NAAQS pollutants. In addition, the State of Wyoming promulgated their own Wyoming Ambient Air Quality Standards (WAAQS), which are nearly identical to the NAAQS. The State of Wyoming must comply with these standards and thus measure in various locations to meet the requirements. In support of measuring for NAAQS compounds, other parameters, such as THC must also be monitored to understand the origins of the NAAQS compounds in question.</p>
<p>Step 2. Identify the Goal of the Study</p>	<p>Not only does the State of Wyoming have to measure for these NAAQS pollutants, they must adhere to the level of the standard (attainment vs. nonattainment as promulgated in 40 CFR Part 50³). In order to understand the environment as a whole, THC data must be collected in support of the NAAQS pollutant data that are generally collected at some location within the network.</p>
<p>Step 3. Identify Information Input</p>	<p>The input information is the hourly THC data that are collected at the locations where THC is monitored (see Appendix B).</p>

DQO Step	Output to Discussion by Decision Makers
Step 4. Define the Boundaries of the Study	The boundary of the study is the entire State of Wyoming. This study only applies to the WDEQ-AQD Primary Quality Assurance Organization (PQAO).
Step 5. Develop the Analytical Approach	The WDEQ-AQD will collect THC data at all of the monitoring locations stated in Appendix B. At the end of the year, the WDEQ-AQD will review, analyze, and certify that the data collected within the WDEQ-AQD network are valid within the parameters laid out in this QAPP.
Step 6. Specify Performance Criteria	The performance criteria are described in this QAPP under the MQOs and thus the DQIs. If the data collected adhere to these performance criteria, then the data can be used to ascertain if the State of Wyoming is within nonattainment or attainment status. In addition, the THC data and its species data can be used to understand the nature of the sources of the pollutants and aid in their mitigation.
Step 7. Develop the Plan for Obtaining Data	Having developed these DQOs, the WDEQ-AQD has developed this THC QAPP and SOP for THC analyzers to ensure that the QA and QC procedures are documented and followed by WDEQ-AQD staff and their Contractors.

7.2 Data Quality Indicators

The data quality indicators (DQIs) are a set of indicators which can be easily measured. For instance, precision and bias can be calculated using the statistical methods upon the data. The other DQIs, are either inherent in the THC instruments, i.e., detection limits, or indicate how the samples are handled and analyzed.

Here is a discussion of each DQI:

- **Precision** - a measure of agreement among repeated measurements of the same property under identical, or substantially similar, conditions. This is the random component of error. Precision is estimated by various statistical techniques typically using some derivation of the standard deviation. For THC, precision is determined based on the three-day zero, span, and precision checks.
- **Bias** - the systematic or persistent distortion of a measurement process which causes error in one direction. Bias will be determined by estimating the positive and negative deviation from the true value. Bias is determined by using the paired data from the one in three-day QC checks.
- **Detection Limit** - The lowest concentration or amount of the target analytic that can be determined to be different from zero by a single measurement at a stated level of probability. For the high-sensitivity instruments, this is an important DQI. The EPA specifies how and how often the Method Detection Limit test is performed, which is recommended annually. The specific procedures are detailed in the SOP for THC analyzers that is the companion document to this QAPP.
- **Completeness** - describes the amount of valid data obtained from a measurement system compared to the amount that was expected to be obtained under normal conditions. Data completeness requirements discussed in NAAQS (40 CFR Part 50)⁶.
- **Comparability** – generally is falls under the auspice of equipment specifications and monitoring methods. EPA does not specify which instruments to use because neither THC nor its species have attainment standards. However, the EPA, through its Technical Assistance Documents (TADs) does specify the general type of instruments that should be utilized^{3,5}. The methodology uses federally

approved glassware and Teflon tubing to draw sample into the instruments that reside in monitoring shelters across the network.

- **Representativeness**- This DQI deals with whether or not the location of the THC instrument represents the type of monitoring that is necessary, i.e., are the stations sited appropriately for the objective.
- **Accuracy** - is a measure of the overall agreement of a measurement to a known value and includes a combination of random error (precision) and systematic error (bias) components of sampling. This is performed using the annual performance evaluations (APEs). These QA procedures are discussed in more detail in Section 20 of this QAPP.

The goals for acceptable measurement uncertainty (precision) for THC is an upper 90 percent confidence limit for the coefficient variation (CV) of <10.1 percent (%). The bias for THC is expressed as an upper 95% confidence limit for the absolute bias of <10.1%.

7.3 Representativeness of the THC Measurements

Site selection and probe placement followed guidelines in the following US EPA documents to ensure that measurements are representative of meteorological and air quality monitoring conditions near the monitoring stations:

- EPA's Quality Assurance Handbook for Air Pollution Measurement Systems, Volume II: Ambient Air Quality Monitoring Program, EPA-454/B-17-001, January 2017²
- Technical Assistance Document for Precursor Gas Measurements in the NCore Multi-Pollutant Monitoring Network, Version 4, EPA-454/R-05-003 September 2005³
- Technical Assistance Document for Sampling and Analysis of Ozone Precursors for the Photochemical Assessment Monitoring Stations Program, EPA Document EPA-454/B-19-004, April 2019⁵

The monitoring sites that were selected to house the THC instruments were selected to be as representative as possible to the general region of interest. Placement of monitors considered local interferences, distance to structures, trees, and roadways, and height of probe above ground. The network was set up in accordance with EPA-defined ambient air quality siting criteria.

8.0 Special Training/Certifications

Personnel assigned to the APMP will meet the educational, work experience, responsibility, and training requirements for their positions. Records on personnel qualifications and training will be maintained in personnel files and will be accessible for review during audit activities.

Adequate education and training are integral to any monitoring program that strives for reliable and comparable data. It is recommended that WDEQ-AQD maintain some requirements for personnel qualifications (combination of education and experience). Training is aimed at increasing the effectiveness of employees and their organization.

As part of a quality assurance program the procedures should include information on:

- Personnel qualifications (general and position-specific)
- Training requirements (based on position)
- Frequency of training

Appropriate training should be available to employees supporting the APMP and commensurate with their duties. Such training may consist of classroom lectures, workshops, web-based courses, teleconferences, vendor-provided and on-the-job training. Training should also include appropriate reading materials, such as the CFR, EPA guidance documents, and the monitoring organization's QAPPs and SOPs, to name a few.

EPA encourages monitoring organizations to maintain documentation that details the training provided to all monitoring staff, along with documentation that illustrates the successful completion of the training requirements. Along with suggested training, there are some EPA programs that require mandatory training and/or certifications. These programs include, but are not limited to, the National Performance Audit Program (NPAP) and the Performance Evaluation Program (PEP). All personnel performing audits in these projects or programs are required to possess mandatory training or a current certification issued by the EPA Office responsible for the monitoring program. Over the years, a number of courses have been developed for personnel involved with ambient air monitoring and quality assurance aspects.

Formal QA/QC training is offered through the following organizations:

- Air Knowledge: <https://airknowledge.gov/>
- Air & Waste Management Association (AWMA): <https://www.awma.org/>
- American Society for Quality (ASQ): <https://asq.org/>
- EPA Quality Program: <https://www.epa.gov/quality>
- EPA Regional Offices: <https://www.epa.gov/aboutepa/regional-and-geographic-offices>
- EPA Ambient Monitoring Technology Information Center (AMTIC) Technology Transfer Network: <https://www.epa.gov/amtic>

WDEQ-AQD should consider adding manufacturer-provided training to the equipment purchase cost. Persons having experience in the subject matter described in the courses would select courses according to their appropriate experience level. Courses not included in the core sequence would be selected according to individual responsibilities, preferences, and available resources.

9.0 Documents and Records

The WDEQ-AQD is committed to fully documenting all activities related to data collection, analysis, validation, and reporting. Table 4 contains a list of the records maintained by the APMP. These records can be electronic, bound in notebooks, and/or forms that are used for specific applications. Electronic records will be stored on main office storage drives and archived by the Contractors and ultimately, the WDEQ-AQD office servers. All project files are backed up daily. In addition, weekly network backup occurs. The weekly backup network files are stored onto external hard drives which are stored off-site. The WDEQ-AQD has several of these backup hard drives and copies of the field logbook are archived in the WDEQ-AQD Cheyenne office for five (5) years.

Table 4. Documentation and Reports

Documentation Type	Frequency	Report Submission	Archive	Retention Period
Monitoring Data	Daily Downloads	Contractors	WDEQ-AQD and Contractor's Serve (with backup)	5 years
QAPP and SOPs	Annually or more frequently, as needed	QA Coordinator	WDEQ-AQD	5 years
Copies of Field Logbooks	After each site visit	Site Operators and Contractors	WDEQ-AQD and Contractors	5 years
Quarterly Reports	Quarterly	Contractors	WDEQ-AQD and Contractors	5 years
Annual Data Report	Annually	Contractors	WDEQ-AQD and Contractors	5 years
Performance Audit Summaries	Semi-Annually	QA Coordinator or Contractor	WDEQ-AQD	5 years

All monitoring data, reports and program documentation will be retained by WEDQ-AQD for a minimum of five (5) years. The WDEQ-AQD will review and approve updates or changes to the QAPP plan given updates or changes to the Records Management Plan.

Section B. Data Generation and Acquisition

10.0 Network Description

This section describes the project design and implementation of the THC monitoring network. For the list of current location and a description of the THC Monitoring Network, please see Section 1.0 of Appendix B, Instrument Locations.

11.0 Sampling Method

The THC network maintained by the WDEQ-AQD is placed in monitoring shelters across the State. The samples are drawn into the instrument as detailed in Volume II of EPA's Quality Assurance Handbook and Technical Assistance Documents for Measurement Systems^{2,3,5}. THC are measured by sampling ambient air from either a borosilicate glass manifold and sample lines that are made of GC grade stainless steel, tetrafluoroethylene (TFE), polytetrafluoroethylene (PTFE) or perfluoroalkoxy (PFA). For THC instruments, the sampling inlet is on the roof of the shelter approximately four (4) meters above-ground-level (AGL). The Teflon sampling line or glass manifold is protected by a pipe with a Teflon-coated cover protecting the inlet probe. A Teflon particulate filter also protects the sampling line.

Calibrations and verification are performed by injecting known VOCs stored in cylinders. For the CH₄/NMHC instrument, CH₄ and propane (C₃H₈) are blended together in one cylinder. Both are very stable gases that can be stored in compressed aluminum cylinders. For the BTEX instrument, the BTEX compounds are also blended together into one cylinder. Because of this, cylinders can be filled with known concentrations of VOCs and shipped to any location. The VOC concentrations, if high enough, can be stable in the cylinders for many years. Several gas vendors lease or sell cylinders that are traceable to the National Institute of Standards and Technology (NIST) traceable standards for CH₄/C₃H₈ and BTEX. In this manner, cylinders can be leased of known concentrations and taken to the ambient air monitoring locations throughout the State of Wyoming and utilized to calibrate, verify or audit the instruments in the field. Please note that gas cylinders must be stored safely and requires strapping or chaining the cylinder in a vertical position to a wall or secured fastened bench.

The THC and BTEX analyzers have their own PFA inlet lines that utilize GC grade stainless steel to connect to a port directly into each analyzer separately. A pump is connected to the end of the manifold to keep the residence time as low as possible. The residence time of the analyzers will be maintained at less than twenty (20) seconds residence time requirement. The THC probe siting information and site configuration for the monitoring are in accordance with 40 CFR Part 58 Appendix E⁷.

11.1 THC Analyzers

For a list of the current instruments utilized throughout the monitoring network, please see Appendix B, Section 1.0, and Types of Instruments.

11.2 Support Monitoring Equipment

The operating range of the analyzers easily brackets the range of environmental conditions expected at the site. The SOP for THC analyzers details the calibration and operation the equipment. A description of the support monitoring equipment is listed below.

11.3 Data Acquisition System

Instantaneous data from the THC instruments is transferred once per minute to the DAS usually by a serial cable. The DAS is a self-contained box with the ability to measure and control electronics, communicate with on-site computers or remote systems. Data is generally stored in a table format.

Please note that the DAS stores 1-minute and hourly data (at a minimum). The one-second data is not stored. In addition, the DAS communicates with the multi-gas dilution calibrator and initiates automated zero, precision and span verifications. In addition, the DAS also records the response to the verification and then can compare that response to the expected value.

11.4 Telecommunications

Telecommunication services are used for high speed remote communication to all onsite equipment including the DAS. Additionally, each analyzer onsite is configured with a unique Internet Protocol (IP) address for remote maintenance and control purposes. The gateway has all of the firewall protection and routing protocols necessary for protection, isolation, and security.

11.5 Climate-Controlled Shelter

The shelter temperature is maintained by a heating, ventilating, air conditioning (HVAC) system. The temperature is controlled by a thermostat located within the shelter. The temperature is maintained at 20-30 °C at all times. The shelter houses the analyzers, calibration equipment, sample intake manifold, DAS and cylinders.

11.6 Zero Air System

In order to determine the baseline of the instrument and its detection limit, a zero air system is used. The zero air system is a fully self-contained source of high purity zero air for dilution calibrators. It is ideal for use with trace and non-trace analyzers in ambient background and trace level applications. The zero air system includes a dewpoint sensor, an oil and diaphragm-free pump, scrubbers to remove all pollutants measured.

The regenerative, heatless dryer removes water and produces output with a dew point less than -40°C (up to a flow rate of 30 standard liters per minute (SLPM)). The system's pressure, temperature, and dewpoint values are all continuously monitored, which allows a microcontroller to adjust the pump cycling frequency, valve timing, and heater power for optimal performance. The WDEQ-AQD Contractor's will perform an annual zero air test. This is performed by substituting the zero air generator with a compressed gas zero air cylinder from a verified gas vendor. The gas cylinder is hooked up to the Mass Flow Controller unit and all analyzers are allowed to sample the zero air from the cylinder. The zero response of the ozone analyzer is then compared to the zero air response from the zero air generator.

11.7 Multi-Gas Dilution Calibrator

The multi-gas dilution calibrator is an integrated gas flow controlling device that contains mass flow controllers (MFC) that are able to flow and mix very precise and accurate amounts of gases to be shunted to the analyzers. A high pressure cylinder with a known concentration of THC species (i.e., CH₄ and C₃H₈) flows from the cylinder and is shunted through a solenoid valve. This gas is then mixed with "zero air", i.e., air that has less than 1.0 part per billion-Carbon (ppbC) of any THC species in a mixing chamber. Once the zero air and THC species are mixed, it is allowed to enter the station teflon manifold. The THC analyzer draws in this gas and measures the concentration. Since the gas in the cylinder is NIST traceable and of known concentration and the air flow of the zero air generators is known, the instrument can be verified and or calibrated. Thus the traceability of the NIST concentration in the cylinder is transferred to the instrument.

11.8 Standard Operating Procedures

A SOP has been developed to provide instructions to the Site Operators regarding routine operation of the THC instruments. The SOP for THC analyzers cover the manual zero, span, precision checks, and calibrations. Equipment inspection, acceptance testing, visual inspections and preventive maintenance are detailed in the operations manual that accompanied the instrument upon purchase. The SOP for THC analyzers is an independent document that is a companion to this QAPP.

The identification, cause, and corrective action for conditions adverse to quality will be documented on the Corrective Action Report form (see the SOP). Follow-up action will be taken by Contractor and Project Manager to verify the corrective action was taken.

12.0 Sample Handling and Custody

Hydrocarbon samples are collected through Borosilicate glass which extends to the outside of the shelter. GC grade stainless steel TFE, PTFE, and PFA lines are considered acceptable by the manufacture for used as intake sampling material for THC and the speciated VOCs. The residence time, which is defined as the amount of time that it takes for a sample of air to travel from the opening of the cane to the inlet of the analyzer, is required to be twenty (20) seconds or less (recommended ten (10) seconds or less)⁷.

13.0 Analytical Method

The measurements of CH₄, NMHC and THC are based on the science of gas chromatography (GC). The GC uses columns that are packed with materials that absorb and separate VOCs specifically for this application. GC technology is an analytical tool that was initially developed early in the 1960s. A detailed discussion of chromatographic theory goes beyond the scope of this QAPP, however, a basic understanding of chromatographic principals may be helpful for instrument setup and troubleshooting.

The air sample enters the instrument and is shunted to a GC column. The solenoid valve that allowed the sample to enter is then closed. The sample sits in the column that is heated to 65°C. CH₄, which is the lightest of all THC compounds and has the lowest boiling point, leaves the column first and is detected by a flame ionization detector (FID). The response of the FID is a peak that is integrated by the hardware and software. Shortly after the CH₄ leaves the column and is measured by the FID, the NMHC leaves the column and the peak is measured by the FID. In this manner, the CH₄ and NMHC are measured and then combined to estimate the THC.

For the BTEX instrument, the process is similar but the detection and the timing in the column is different. The sample is injected into the instrument and is shunted to a special GC column designed for speciating THC. The sample is pushed into the column and depending on the VOC's molecular weight and composition, it will pass through the column at different speeds. A carrier gas, usually nitrogen is then shunted to the column and the carrier gas begins to flush the VOC's out of the column. The VOCs then pass by an ultraviolet light source that ionizes the VOCs. These VOCs then emit light that are detected by a photoionization detector (PID). Due to the timing of the instrument and flow rate, the BTEX compounds are measured because the flow and timing for these compounds are synchronized with the column, carrier gas and PID.

The WDEQ-AQD utilizes three (3) THC analyzers: the Baseline – Mocon 9000 CH₄/NMHC instrument, the Baseline – Mocon 9100 BTEX instrument, and the Teledyne N-901 CH₄/NMHC instrument. EPA does not specify any or recommend any THC analyzers, therefore, the WDEQ-AQD utilizes the Baseline and Teledyne instruments because of their familiarity with the instruments and their continued reliability.

14.0 Quality Control Requirements

This section describes the routine quality control procedures used for the THC monitoring program. All procedures have been specifically designed to provide the appropriate quality control and ensure that valid data recovery meets or exceeds the WDEQ data recovery requirements of 90 percent per quarter for THC monitoring.

The WDEQ-AQD monitoring program will follow the QC guidelines as stated in the following documents:

- EPA’s Quality Assurance Handbook for Air Pollution Measurement Systems Volume II: Ambient Air Quality Monitoring Program, January 2017²
- Technical Assistance Document for Precursor Gas Measurements in the NCore Multi-Pollutant Monitoring Network, Version 4, EPA-454/R-05-003 September 2005³.
- Technical Assistance Document for Sampling and Analysis of Ozone Precursors for the Photochemical Assessment Monitoring Stations Program, EPA Document EPA-454/B-19-004, April 2019⁵

14.1 Instrument/Equipment Calibration and Frequency

Table 5 and Table 6 illustrate the QC procedures and their frequency for THC instruments.

Table 5. THC Instrument QC Procedures

Procedure	Frequency	Requirement
Visual Inspection of Equipment	Each site visit; typically, once a month	As needed
Remote interrogation of monitoring station and inspection of data	Daily	QC Checks for data screening
Calibration	Quarterly	Meets MQO
Cylinder Certification	Depending on the mixture of gases in the cylinder, once every three years (specified on Certificate of Analysis).	Ship the cylinder to the gas vendor for recertification to NIST Traceable Standards.
Zero/span checks	Once every 3 days	Meets MQO
Precision checks	Once every 3 days	Meets MQO
Equipment Maintenance	As needed or as the operating manual recommends	See SOP and equipment manuals
In-line filter change	Each site visit; typically once a month	As needed
Data validation	Daily and monthly	Electronic data screening time/parameter plot visual check
	Quarterly	Data processing calculation check Missing data: confirmed off-line periods, confirmed data validation checklist.

Table 6. Calibration Requirements and Frequencies for CH₄/NMHC

Activity	Frequency	Action Level Criteria	Data Validation Acceptance Criteria	Action
Calibration	Quarterly or after failed QC check or maintenance	±10.1% of expected value	±15.1% of expected value	Invalidate data to last known calibration and recalibrate if points are outside of acceptance criteria.
Linearity	When Calibration is performed	±1.1% of best fit straight line	±2.1% of best fit straight line	Invalidate data to last known calibration and recalibrate if points are outside of acceptance criteria.
One Point QC Check (Precision Check)	Once every 3 days	±10.1% of expected value	±15.1% of expected value	Points outside of acceptance criteria are repeated and data is invalidated to last acceptable multipoint calibration or ZPS check, or to a point in time where the analyzer failure is identified.
Zero Check	Once every 3 days	<0.35 ppm (CH ₄ /NMHC/THC) <0.1 ppb (BTEX)	<0.5 ppm (CH ₄ /NMHC/THC) <5.1 ppb (BTEX)	Invalidate data to last acceptable zero/span check or to a point in time when the analyzer failure is identified. Adjust analyzer and perform multipoint calibration.
Span Check (drift)	Once every 3 days	±10.1% of expected value	±15.1% of expected value	Invalidate data to last acceptable zero/span check or to a point in time when the analyzer failure is identified. Adjust analyzer and perform multipoint calibration.
Annual Performance Evaluation (Audit)	All sites semi-annually. Cheyenne NCore and Boulder location quarterly	-	±15.1% of expected value	Zero point and at least three gas points. Points outside acceptance criteria are repeated. If still outside, invalidate data to last acceptable calibration.
Data Completeness	Quarterly	>90%	-	-

14.2 Visual Inspection of Equipment

The Site Operator visits the shelter monthly, or as often as weather permits to check that the analyzers are operational and recording concentrations typical for the environment. At this time, the Site Operator will inspect the shelter temperature and adjust the thermostat, if necessary.

14.3 Remote Interrogation of Monitoring Station and Inspection of Data

The DAS at the monitoring stations will be interrogated daily via internet connection to download and process the data. Abnormal data values or problems will be reported as soon as possible to the Contractor, who will initiate corrective action and determine if a special site visit is required. Computerized inspection and visual inspection of these data will be performed daily using an outlier program. Values that fall outside of prescribed limits (Table 5 and Table 6) will be evaluated by the Contractor and Project Manager and corrections to data will be documented.

14.4 Equipment Calibration

THC analyzers will be calibrated quarterly (i.e., multipoint calibration), when changes are made to the analyzer, or when problems require it. All MFC flow rates will be verified quarterly with a NIST Traceable flow standard.

14.5 Calibration Reference Standard Certification

NIST traceable compressed CH₄/C₃H₈ and BTEX gas cylinders will be purchased from reputable vendors who can provide NIST traceability for their gases. Only NIST certified vendors will be used. All gases are stored in aluminum cylinders and are shipped back to the vendor before the gas standard date lapses.

14.6 Zero and Span Checks

Quality control procedures include every three (3) day zero and span checks. The instruments are challenged using NIST Traceable gases blended with zero air within the MFC. See the SOP for THC analyzers for the zero and span check procedures.

14.7 One-point QC Checks

QC or precision checks of the THC analyzers will consist of a one-point check performed immediately following the zero/span checks every three (3) days. These precision checks will be conducted by challenging the analyzers with a standard gas at a known concentration. These precision checks will be done in conjunction with the zero/span checks but done prior to any zero or span adjustments performed as part of those checks. The concentration will be approximately 8 to 10 % of the Upper Range Limit (URL) for THC. See the SOP for THC analyzers for the one-point QC check procedure.

15.0 Equipment Maintenance

The manufacturer's recommendations for maintenance will be followed. Instrument instruction manuals are available at the site for reference of preventive and remedial maintenance procedures. Preventive and corrective maintenance will be documented on the calibration forms (there are example forms shown in the SOP for THC analyzers) completed immediately after any maintenance. See Section 16.3 for the instrument and support equipment maintenance procedures.

The table below (Table 7) illustrates the acceptance criteria and references for the support equipment, siting and reporting units for the THC network.

Table 7. Systematic Criteria for THC Support Equipment

Requirement	Frequency	Acceptance Criteria	Reference
Sample Probe, sample lines	-	Borosilicate glass, gas chromatographic grade Stainless Steel	40 CFR Part 58 Appendix E ⁷
Siting	1/year	Meets siting criteria	40 CFR Part 58 Appendix E ⁷
Reporting Units	ppm for CH ₄ and NMHC and ppb BTEX for WyVisNet, ppmC for AQS-formatted data	-	-

16.0 Instrument Equipment Testing, and Inspection

16.1 Acceptance Testing of Instrumentation and Equipment Integration

Prior to installation, all equipment will be visually inspected to ensure there is no physical damage. Acceptance testing of instrumentation will be performed to verify that the instruments meet the required US EPA performance specifications. THC analyzers that fail to meet specifications will be returned to the manufacturer. After installation, the analyzers are calibrated according to the SOP for THC analyzers. Preventive maintenance will be performed as per Section 16.3 of this QAPP and the manufacturer's operations manual. QC procedures will be conducted on a routine basis, as described in the SOP for THC analyzers.

To ensure that the analyzers are operating properly, periodic performance audits are conducted by the WDEQ-AQD. This is described in Section 20 of this QAPP and the SOP for performance evaluations of gaseous analyzers.

16.2 Site Surveillance and System Check Procedures

The Site Operator will visit the monitoring station (monthly) to inspect the monitoring equipment. The Site Operator will conduct monthly flow checks, filter exchanges, and will perform any maintenance that is required. The Site Operator will also verify proper operation of the DAS, zero air system and calibration system.

During each site visit, entries will be made in the site or electronic logbook (E-log) documenting all site activities conducted. These entries will include the date of the visit, reason for the visit, and the maintenance or calibration activities performed. If changes are made to the equipment or configuration of the system, these changes will also be entered in the site logbook. Entries will be made any time there is a change or modification in the way a sample is obtained, or the station configuration altered. If the Site Operator encounters a problem which cannot be rectified, he/she will contact the Contractor who will be responsible for resolving the issue. The Contractor will initiate a plan for corrective action and will employ whatever resources are required to rectify the situation.

Electronic logbook entries will be made when: (1) tubing is re-routed or new fittings or other components are added or removed in any stream of sample air calibration gas between analyzers, calibrators, or sampling ports on the sampling tubing or station manifold, (2) the relative position of the analyzer's sample ports on the manifold or tubing is changed, (3) a new blower is added or a pump in an analyzer is replaced, (4) the location of a sampling inlet or port is moved or (5) any similar change in the air monitoring station's configuration.

16.3 Site and Equipment Maintenance

The manufacturer's recommendations for maintenance of the THC analyzers will be followed. Instrument instruction manuals are available for THC concerning preventive and remedial maintenance procedures. Preventive and corrective maintenance will be documented on the calibration forms completed immediately after any maintenance. The Teflon intake sample lines are checked for cracks or leakage and are replaced, as necessary. See

Table **8** and Table 9 for activity and frequency.

Table 8. Site Maintenance Activities

Maintenance Activity	Frequency
Sample intake manifold cleaning	Monthly or as needed
Sample inlet tubing replacement	Annually or as needed
Monitoring shelter floor cleaning	Monthly or as needed
Monitoring shelter trash removal	As needed
Monitoring shelter light bulb replacement	As needed
Heating/AC system filter replacement	As needed
Main sample intake filter	Quarterly or as needed

Table 9. Equipment Maintenance Activities

Maintenance Activity	Frequency
CH₄/NMHC Analyzer	
Particulate filter replacement	Quarterly or as needed
Check air or fuel gas flows	Each site visit
Electrometer cable connection	As needed
Check FID for cleanliness	Annually or as needed
Leak check	Annually or as needed
Check temperature set point	Annually or as needed
Rebuild pump	Annually or as needed
Check flow rates of H ₂ , O ₂	Each site visit
Check internal fan	Each site visit or as needed
BTEX Analyzer	
Particulate filter replacement	Quarterly or as needed
Sample flow calibration	Monthly or as needed
Carrier flow calibration	Monthly or as needed
Leak check	Annually or as needed
Check temperature Set Point	Annually or as needed
Rebuild pump	Annually or as needed
Check internal fan	Annually or as needed
Mass Flow Dynamic Gas Calibrator	
Verify Test Functions	After maintenance or repair
Perform Flow Check	Quarterly or as needed
Perform Leak Check	Annually or after maintenance
Examine Pneumatic Lines	Quarterly or as needed
Zero Air System	
Check tubing	Quarterly or as needed
Replace charcoal scrubber	Annually
Replace purafil	Annually
Replace HC scrubber	When contaminated
Replace regenerative dryer	When contaminated
Replace particulate filter on rear panel	Annually
Replace 4-way valve	Annually or as needed

17.0 Inspection/Acceptance of Supplies and Consumables

17.1 Spare Parts

Spare parts for the THC analyzers will be stored in the monitoring shelter and will be used as needed. These spare parts include, but are not limited to, pump re-build kits, Teflon sample filters, zero air scrubber material, and various o-rings.

17.2 Inspection/Acceptance of Supplies and Consumables

Spare parts will be purchased only from the instrumentation manufacturer by the Project Managers or Contractor. Parts will be inspected by the Project Manager, Contractor or Site Operator for shipping damage upon receipt. Spare parts will be kept in the monitoring shelter for use when needed. The use of spare parts will be documented on calibration forms.

The THC analyzers, the multi-gas calibrator, and zero-air system use inlet filters, Purafil, charcoal and span gas do not require acceptance testing. Inlet filters are replaced by the Site Operator approximately every month. The Purafil and charcoal is replaced yearly or more frequently, as needed.

18.0 Non-Direct Measurements

There are no NAAQS or WAAQS for THC data or its species; therefore, the data collected from this monitoring program are not used for NAAQS and WAAQS non-attainment decisions. However, THC and BTEX data are utilized for compliance and/or dispersion modeling with other ambient air monitoring data.

19.0 Data Management

The proper management of all data is critical to assuring the quality and usability of the monitoring results. As such, procedures have been implemented to ensure robust data acquisition, validation, reduction, reporting, and storage of electronic data. THC data will be recorded and stored on site DAS. Data will be retrieved from the monitoring site daily via internet connection. The monitoring site can be called from any computer having the correct software and the IP address.

All electronic calculations and statistical analyses will be performed using standard software that can be easily verified. All project documentation, records, data, and reports will be stored for at least five (5) years following project completion. The data are stored at the WDEQ-AQD network servers.

THC data will be reviewed routinely by the Contractor and Project Manager assigned to the monitoring station. These data will be subjected to several levels of QC, validation and QA. Validated data are compiled into the final database for further analysis and report preparation. The final database is processed and stored on a personal computer and then archived on various storage media and maintained in duplicate in more than one location for protection. For more details, please see Sections 21 and 22.

19.1 Data Retrieval

Data are retrieved from the site by connecting to the DAS via remote telemetry. In the past, WDEQ-AQD did not house the raw data. The data were housed and validated data by the Contractors. Recently, the WDEQ-AQD changed over to the AirVision platform also known as WyVisNet. This is a WDEQ-AQD housed data storage system that will be the accessible to both Contractors and WDEQ-AQD staff. For the SLAMs stations (PM), the WDEQ-AQD data will housed in AirVision system and the WDEQ-AQD staff will perform validation on the data. For our SPM/gaseous stations, the Contractors will be the primary data repository.

19.2 Raw Data

Raw data are records, notes, memoranda, worksheets or exact copies and are the result of original observations and activities of the monitoring project. Raw data include data from the DAS and data entered directly into a system.

19.3 Data Transfer

The analyzer and sensors produce digital and analog voltages that are collected by a DAS and averaged for a particular time period. The data are stored on a network and are validated quarterly. The hourly air quality data are uploaded to WyVisNet every hour approximately fifteen (15) minutes after the hour.

19.4 DAS Data Review

Data review is performed by the Contractor. The review of the data includes reviewing the calibration information, zero/span/one-point QC checks, flow checks, maintenance logs, hourly data, flags, and recording any information that might be vital to proper review of the data. Information used in the review may be used to invalidate data.

It is recommended that the Contractor follow a checklist when reviewing. This list should provide a reminder for the reviewer to verify missing data periods, percent data recovery, or data table calculations, to name a few. Data review also includes documentation of suspect data or invalidations that occurred.

19.5 Data Validation

Data validation ensures that data processing operations have been carried out correctly and that the field operations have been performed properly and in accordance with written procedures. Once data validation has identified problems, the data can be corrected, flagged or invalidated and correction actions can be taken when necessary. In the event of a failed audit or out of range calibration, the Contractor or Project Manager will be responsible for checking or invalidating data. Data validation procedures are described in detail in Section 22.

19.6 Data Transmittal

Data transmittal occurs when data are transferred from one location to another or from one person or group to another. An example of data transfer is the electronic transfer of data over a telephone or computer network. WDEQ-AQD requires that data be prepared in AQS format on a quarterly basis and stored in zip files with a specific name format that incorporates the reported year and quarter

The Data Manager will report all ambient air quality data and information as specified by the AQS Users Guide⁸ and coded in the AQS format. Such data will be fully validated and will be submitted directly to the AQS via electronic transmission.

19.7 Data Processing

Data processing includes the aggregating and summarizing of results so they can be easily understood and interpreted in various ways. EPA regulations require certain summary data be computed and reported on a regular basis such as precision, accuracy, bias, etc.

19.8 Data Analyses

Data summary and analysis requirements, as presented in 40 CFR Part 58, Appendix A⁷ will be followed for this program. Single analyzer accuracy, based on performance audits, single analyzer precision, bias, and data completeness will be tracked and reported for the monitoring network.

Section C. Assessment and Oversight

20.0 Assessment and Response Actions

The QA Coordinator will perform the quarterly (Boulder and Cheyenne NCore) and semi-annual (SPMS) performance audits on the THC samplers. Audit procedures and techniques followed by the WDEQ-AQD are established EPA audit guidelines.

Performance audits are attended by a Contractor representative and the QA Coordinator. The auditor will use the site logbook to record the times and parameters audited, as well as any witnesses to the audit. Electronic documentation of audit results will be kept for a period of five years following the audit. Audit summaries are available on WDEQ-AQD's IMPACT system.

EPA does not specific audit levels for the THC pollutants. WDEQ-AQD has determined appropriate audit levels for THC compounds and they are shown in Table 10 and Table 11.

Table 10. Methane/Non-Methane Audit Levels

Audit Level	CH ₄ /C ₃ H ₈ Concentration Range (ppm)
1	0.020 – 0.059
2	0.060 – 0.199
3	0.200 – 0.899
4	0.900 – 2.999
5	3.000 – 7.999
6	8.000 – 15.999
7	16.000 – 30.999

Table 11. BTEX Audit Levels

Audit Level	BTEX Concentration Range (ppm)
1	0.0003 – 0.0029
2	0.0030 – 0.0049
3	0.0050 – 0.0079
4	0.0080 – 0.0199
5	0.0200 – 0.0499
6	0.0500 – 0.0999
7	0.1000 – 0.1499
8	0.1500 – 0.2599
9	0.2600 – 0.7999
10	0.8000 – 1.000

The March 27, 2016, Federal Register provided the final rule for the quality assurance changes in both 40 CFR Part 58 Appendix A and Appendix B⁷. One (1) part of the revised rule was the selection of the audit levels for Annual Performance Evaluations. This revision states, that one-point must be within two (2) to three (3) times the method detection limit of the instruments within the PQAOs network, the second point will be less than or equal to the 99th percentile of the data at the site or the network of sites in the PQAo or the next highest audit concentration level. The third point can be around the primary NAAQS or the highest 3-year concentration at the site or the network of sites in the PQAo. An additional 4th level is encouraged for those agencies that would like to confirm the monitors' linearity at the higher end of the operational range. The WDEQ-AQD auditor will select at least three (3) audit levels that best reflect the

measured concentrations at the station.

20.1 Data Quality Audits

Data review is conducted daily utilizing electronic and visual scanning to identify outliers and determine whether data are reasonable and representative. The systems audit includes confirmation of the integrity of transmitted data from sensor outputs to data reporting.

20.2 Corrective Actions

All deficiencies identified during routine data surveillance, performance audits and/or site surveillances will be documented and reported to the Project Manager and Contractor no later than one working day of discovery and, depending on the nature of the deficiency, corrective action will be made no later than seven (7) business days of the notification. Corrective actions to deficiencies will be addressed and documented in the station logbook and on a corrective action report. Follow-up action shall be taken to verify implementation of the corrective action. A corrective action report form will be filled out that identified the problem or deficiency, the proposed corrective action, and the results of the corrective action. An example of a corrective action report is presented in Appendix A, the SOP for THC analyzers. WDEQ-AQD has the authority to issue stop work orders to contractors, if necessary.

20.3 QAPP Revisions

If revisions to the QAPPs are needed, any modifications will be performed or approved by the WDEQ-AQD. QAPP reviews will be performed annually by WDEQ-AQD.

21.0 Reports to Management

A summary of the reports to be generated is presented in Table 12. The quality assurance director or her designate will generate reports to management.

Table 12. Reports to Management

Reports	Frequency	Content	Responsible Individual	Distribution
Quarterly Reports (Includes Precision and Accuracy)	Quarterly	Summarize Data for Quarterly Summaries	Contractor	See Section 3 Distribution List
Annual Report	Annually	Summarize data for Annual Reports	Contractor	See Section 3 Distribution List
Email notification of Action Limit reached	As Needed	Discuss instrument issues, ZPS level/percentage, and proposed course of action	Contractor	Project Manager
Corrective Action Reports	As Needed	Summarizes Corrective Actions Taken to return the Monitoring Station into compliant status	Contractor	See Section 3 Distribution List
Response to Corrective Action Reports	As Needed	Reports the results of the Corrective Actions Taken	Contractor	See Section 3 Distribution List
Elevated Pollutant Concentration Notification	As Needed	Report of pollutant concentration that is greater than the predetermined threshold	Contractor	WDEQ-AQD Monitoring Supervisor, Project Manager, Data Manager

Quarterly reports will be submitted to the WDEQ-AQD within sixty (60) days of the end of the monitoring quarter. The annual report will be submitted to the WDEQ-AQD within ninety (90) days of the end of the monitoring year. Corrective action reports are submitted as needed within seven (7) business days of identifying a deficiency and in the quarterly report.

A notification will be submitted to the APMP Supervisor, Project Manager and Data Manager whenever pollutant concentrations measured at the site THC exceed 10.0 ppm for CH₄ or NMHC or 75.0 ppb of any BTEX in an hourly average. Notifications via e-mail will be sent the following business day and will include a graph of the data (including meteorological parameters) from the day the elevated value occurred, along with a brief explanation of the event.

Section D. Data Validation and Usability

22.0 Data Review, Validation, and Verification Requirements

The data criteria requirements are detailed in Table 5 and Table 6. The criteria are based off of the criteria for other gas pollutants, which are based on the EPA QA handbook II. Table 5 and Table 6 are comprised of criteria that are important to the maintenance of the instruments and data quality. Data that does not meet the criteria in Table 6 should be inspected, mitigated, or justified and possibly invalidated unless there is a compelling justification for not doing so.

The Project Managers, Contractors and Site Operators are responsible for verifying proper operation of the monitoring equipment under their control. The Contractor will review the incoming data to the standards discussed in this document. During each quarter, the data will be reviewed again by the Project Manager to ensure that the data are complete, accurate, and representative and that erroneous data have been removed in preparation for the final data report.

The Contractors will routinely check for irregularities during the daily data review. Data review includes evaluation of the raw data, three (3) day zero/span/one-point QC (precision) checks, monthly flow checks, maintenance records, calibration and audit data. Any abnormalities in the data will be flagged and noted on the appropriate checklists. Any suspect data will be brought to the attention of the Project Manager as soon as possible. All other documentation pertaining to the project (i.e. station logs, field notes, calibration and audit sheets) will be reviewed to ensure that erroneous data are identified and removed, as necessary from the final data set.

Calibration procedures for the THC analyzers are discussed in the SOP for THC analyzers. The THC data will be considered valid when the system response indicated precision, bias and accuracy goals are being achieved.

22.1 Data Acceptance Limits for THC

Independent performance audits will be conducted to verify calibration and maintenance of the instruments is correct. Audit results will be used to invalidate periods of data when the analyzer is not operating within the specifications discussed in Table 5 and Table 6. Zero/span checks will be conducted to verify the performance of the THC analyzers every three days.

For the determination of THC, data will be valid and acceptable if the following conditions apply:

- An independent performance audit shows that the mean absolute difference for audit level ± 15.1 percent between analyzer response and audit concentration for CH₄, NMHC or any species of THC (BTEX)
- The analyzer span drift between a span interval does not exceed ± 15 percent as determined by the zero/span checks for CH₄, NMHC or any species of THC (BTEX)
- The analyzer zero drift for one zero check interval does not exceed ± 0.5 ppm for CH₄ or NMHC (24-hour). For the BTEX instrument, ± 5.1 ppb for as determined by the zero checks.

23.0 Data Validation and Verification Methods

THC data are stored on DAS loggers as one (1) minute and hourly averages (at a minimum) computed from one-second values. Data validation will be performed on the hourly average data. An hourly average will be computed when at least nine (9) five-minute averages are available for the hour.

The Project Managers and Contractors are responsible for verifying THC data by reviewing the zero/span/one-point QC checks, flow checks, calibration records, audit results, and field notes from the Site Operators prior to formal acceptance of these data. Precision and bias calculations will also be reviewed. The Project Managers will use the criteria listed in Table 6 to ensure that the reported data meets the appropriate MQOs.

23.1 Level 0 Data Validation

Level 0 data validation is essentially raw data obtained directly from the data acquisition systems in the field. These data have not received any adjustments for known biases or problems that may have been identified during preventive maintenance checks or audits. Level 0 data validation is accomplished by:

- Collecting data via modem
- Initially screening the daily data for anomalies

Stacked parameter plots will be generated which consist of every data point downloaded since the last site interrogation and reviewed by the Contractor for consistency and possible problems. This redundancy assures that problems that might go unnoticed by the software will always be caught by the reviewer.

To aid in data validation, a password-protected project web-site will be hosted and updated daily by the Contractor. This will differ from Contractor to Contractor. The site should contain 24-hour meteorological chart graphics, daily minimum, maximums, and averages, QA reports and wind roses. Historical data should also be accessible. By using this approach, data collection percentages are greatly enhanced and data management personnel can quickly note and resolve any potential instrumentation problems.

23.2 Quality Control Checks for Data Validation

Once data are downloaded via modem, they will be subjected to a series of QC checks by a software package. The software package performs extensive quality control checks of the data, generates a data summary report which lists means, maximums, minimums, time of occurrence, data values which fall outside of prescribed ranges, periods of constant values, and periods of rapid value changes. These criteria may be adjusted as data are collected to more accurately encompass site-specific conditions. For the air quality parameters, additional data review will be initiated by the following:

- CH₄ or NMHC concentrations greater than 10.0 ppm
- BTEX average concentrations greater than 75.0 ppb

The QC software is used to generate flags or warnings that the parameter value is outside of a normally acceptable range. The outlier program does not invalidate data or erase file records on the basis of these outlier tests. Raw data files are never modified and are archived. It will be left to the Contractor to review the results of the outlier program in conjunction with the data parameter plots and initiate corrective actions if warranted (site visit or data invalidation).

23.3 Level 1 Data Validation

After the QC software is run, visual inspection of the data are performed to identify suspect data values that warrant further investigation. These values will be flagged.

Per EPA’s Quality Assurance Handbook for Air Pollution Measurement Systems, Volume II: Ambient Air Quality Monitoring Program², EPA recommends the use of flags or result qualifiers to identify potential problems with data (or a sample). According to EPA, a flag is an indicator of the fact and the reason that a data value (a) did not produce a numeric result, (b) produced a numeric result but it is qualified in some respect relating to the type or validity of the result, or (c) produced a numeric result but for administrative reasons is not to be reported outside the organization.

Thus, quality control flags and codes, consisting of a letter and value will be assigned to each datum to indicate its quality. Multiple flags will be applied to each invalid data point such as data invalid due to calibration. Table 13 presents the data flags and codes that will be applied to the data. Additional AQS qualifier codes can be found at <https://aqs.epa.gov/aqsweb/documents/codetables/qualifiers.html>

Table 13. Data Flags

Flag	Code	Description
V	0	Valid
C	1	Corrected or Estimated
S	7	Suspect: data appears to be a data spike or outside normal data range
I	8	Invalid data
M	9999	Missing data: measurement not taken
BJ	9963	Operator Error
AC	9969	Construction in Area
AE	9971	Shelter Temperature Outside Limits
AH	9974	Sample Flow Rate Out of Limits
AL	9978	Voided by Operator
AM	9979	Miscellaneous Void
AN	9980	Instrument Malfunction
AP	9982	Vandalism
AQ	9983	Collection Failure
AS	9985	Poor QA Results
AT	9986	Calibration
AV	9988	Power Failure
AW	9989	Wildlife Damage
AX	9990	Precision Check
AY	9991	QA Control Points (Zero/Span)
AZ	9992	QC Audit
BA	9993	Maintenance
BB	9994	Unable to Reach Site
BC	9995	Multi-Point Calibration
BD	9996	Auto Calibration
BF	9998	ZPS

To assist in data validation, a copy of the site logbook and E-log will be examined to confirm periods when

instrumentation may have been off-line due to power outages, maintenance or repair, audits, or other quality assurance activities. Significant events will be checked against the graphs for consistency.

QC check data will be reviewed to assess the precision and bias of the data. If the QC checks or calibrations indicate invalid or low precision, data values may be invalidated or adjusted as necessary and the appropriate flags will be applied. The results from the remote zero/span/one-point QC checks will also be reviewed to determine if the air quality data should be considered invalid. Especially high values will be checked to be sure that audit or calibration data were not inadvertently included. Suspect data will be reported but flagged as suspect. Missing data will be left missing.

It is important to maintain detailed, accurate records of changes to the data. The justification for all data invalidations will be permanently documented. Suspect data will also be documented. For reporting purposes, hourly THC data will be presented. In addition, running 8-hour averages THC will also be presented in tables. For CH₄ and NMHC, data below -0.5 ppm and BTEX data below 5.0 ppb will be invalidated.

23.4 Minimum Acceptable Data Recovery Percentage

To be considered valid, each hour of data must consist of at least forty-five (45) minutes (75% of a valid hour) of valid data. The WDEQ-AQD data recovery goal for all species of THC will be at least 90% per quarter.

23.5 Data Report QA Checklist

As part of the data validation process to prepare data for reports, report table content versus data files, missing data, off-line periods, percent data recovery and mathematical calculations are routinely verified.

24.0 Reconciliation with User Requirements

The objective of the THC network is to collect data that will provide the necessary information for the WDEQ-AQD to assess whether the DQOs are being met. The THC data will be used to characterize and monitor trends in air quality and may be used for national health assessments, model evaluations, and comparison with other ambient air monitoring and meteorological data. Following the procedures described in this QAPP and the SOP for THC analyzers will ensure that the DQOs are met and the data will be representative of air quality conditions and be of acceptable quality for precision, bias and completeness.

References

1. Wyoming Department of Environmental Quality- Air Quality Division 2025 Network Plan. https://drive.google.com/file/d/1YM_alkx7NHZWIN3Jfv879GaWfqmhxiKr/view
2. QA Handbook for Air Pollution Measurement Systems: Volume II: Ambient Air Quality Monitoring Program, January 2017. <https://tisch-env.com/wp-content/uploads/2015/05/QA-Handbook-Vol-II.pdf>
3. Technical Assistance Document For Precursor Gas Measurements in the NCore Multi-Pollutant Monitoring Network, Version 4, EPA-454/R-05-003 September 2005. <https://nepis.epa.gov/Exe/ZyNET.exe/P100ACLX.TXT?ZyActionD=ZyDocument&Client=EPA&Index=2000+Thru+2005&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C00thru05%5Ctxt%5C00000027%5CP100ACLX.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL>
4. EPA's Quality Assurance Handbook for Air Pollution Measurement Systems, Volume I: Principles. <https://www.epa.gov/sites/production/files/2020-10/documents/r94-038a.pdf>
5. Technical Assistance Document for Sampling and Analysis of Ozone Precursors for the Photochemical Assessment Monitoring Stations Program, EPA Document EPA-454/R-23-002, May 2023. <https://www.epa.gov/system/files/documents/2023-05/TAD%20R3%20May%202023.pdf>
6. Code of Federal Regulations Title 40 Part 50. https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr50_main_02.tpl
7. Code of Federal Regulations Title 40 Part 58, Appendix A-E. <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-58>
8. AQS Users Guide. <https://www.epa.gov/aqs/aqs-manuals-and-guides>

APPENDIX A: Standard Operating Procedures Total Hydrocarbon Compounds

Appendix A.1 THC SOP Appendix

A.2 THC Audit SOP

Appendix A.1 Standard Operating Procedure for THC Analyzers

**Wyoming
Department of Environmental Quality Air
Quality Division**



WYOMING DEPARTMENT OF
ENVIRONMENTAL
QUALITY

**Standard Operating Procedure For Total
Hydrocarbon Compounds and Speciated Benzene,
Toluene, Ethyl-Benzene and Instruments**

**November 2025
Revision 4**

1.0 Scope and Applicability

1.1 Introduction

Total Hydrocarbon Compounds (THC) in the atmosphere are by-products of incomplete combustion of organic (e.g., gas and petroleum) compounds. There is no National Ambient Air Quality Standard (NAAQS) for any species or sum of THC species. However, one (1) species is toxic to humans and animals (i.e., Benzene) and considered to be carcinogenic. In addition, THC plays a major role in the ozone and fine particulate pollution formation.

The WDEQ-AQD operates THC and THC speciation instruments throughout the network. The speciation instruments are capable of measuring background levels of THC of some species, namely Benzene, Toluene, Ethyl-Benzene and Xylene (BTEX). The WDEQ-AQD also supplements these measurements by triggering speciated canister measurements for evaluation by GC/MS at a laboratory. All of the instruments operated by the WDEQ-AQD are rugged, precise, and accurate and must be stable in the low parts per million-Carbon (ppm-C) or parts per billion-Carbon (ppb-C).

2.0 Summary of Method

This Standard Operating Procedure (SOP) pertains strictly to the collection and analysis of methane (CH₄), Non-methane Hydrocarbon Compounds (NMHC), THC and their species within the State of Wyoming and details the methodologies to establish precise and accurate THC measurements at all stations within the State, regardless of the type of monitoring that is performed. For clarity, the term “THC” will be defined as the total hydrocarbon species that include the following compounds or collection of compounds:

- CH₄: Methane, which is the simplest hydrocarbon species. It is the dominant species in the atmosphere;
- NMHC: Non-methane Hydrocarbon Compounds, this is the total of all atmospheric hydrocarbons (other than CH₄) that have low boiling points and are volatile in most atmospheric conditions. The CH₄/NMHC instrument measures these compounds and differentiates between CH₄ and the rest of the volatile organics as NMHC. For this document, THC = CH₄ + NMHC;
- BTEX: This term refers to a group of simple mono-cyclic hydrocarbons and are volatile organic compounds (VOCs), which are photochemically active (i.e., have a role in the formation of ozone and fine particles).

Measurements measurement of CH₄ and NMHC is based on the science of Gas Chromatography (GC) and the use of columns that are packed with materials that absorb and hold VOCs specifically for this application. GC technology is an analytical tool that was initially developed early in the 1960s. First the sample is allowed to enter the instrument and is shunted to a GC column. The solenoid valve that allowed the sample to enter is then closed. The sample air sits in the column and is heated to 65°C. Through the use of solenoids and valves, CH₄ which is the lightest of all THC compounds and has the lowest boiling point leaves the column first and is detected by a flame ionization detector (FID). The response of the FID is a peak that is integrated by the hardware and software. Shortly after the CH₄ leaves the column and is measured by the FID, the NMHC leaves the column and the second peak is measured by the FID. In this manner, the CH₄, NMHC are measured, and then combined to estimate the THC.

For the BTEX instrument, the process is similar but the detection and the timing in the column is different. The sample is injected into the instrument and is shunted to a special GC column designed for speciating THC. The sample is pushed into the column using a carrier gas and

depending on the VOC's molecular weight and composition; it will pass through the column at different speeds. The carrier gas, usually helium is then shunted to the column and the carrier gas begins to flush the VOC's out of the column. The VOCs then pass by an ultraviolet light source that ionizes the VOCs. These VOCs then emit light that are detected by a photo ionization detector (PID). Due to the timing of the instrument and flow rate, the BTEX compounds are measured because the flow and timing for these compounds are synchronized with the column, carrier gas and PID.

At the time of this writing, the WDEQ-AQD and its contractors utilize three (3) THC analyzers: the Baseline – Mocon 9000 CH₄/NMHC, the Teledyne N901 CH₄, the Baseline – Mocon 9100 BTEX instruments. EPA does not specify any or recommend any THC analyzers; therefore, the WDEQ-AQD and its contractors utilize the Baseline instruments because of their familiarity with the instruments and their continued reliability. The instrument records the data internally and communicates that information to the data acquisition system, DAS. At some sites, the logged NMHC concentration triggers collection of an ambient sample in an evacuated 6L canister. The canisters are then shipped to a laboratory for TO-14/TO-15 analysis.

The THC network maintained by the WDEQ-AQD is placed in monitoring shelters across the State. The samples are drawn into the instrument as detailed in Volume II of EPA's Quality Assurance Handbook and Technical Assistance Documents for Measurement Systems^{1,2}. THC are measured by sampling ambient air from either a borosilicate glass manifold and sample lines that are made of GC grade stainless steel, tetrafluoroethylene (TFE), polytetrafluoroethylene (PTFE) or perfluoroalkoxy (PFA) For THC instruments, the sampling inlet is on the roof of the shelter approximately four (4) meters above-ground-level (AGL). A stainless steel sintered particulate filter also protects the sampling line.

CH₄, propane (C₃H₈), and BTEX are stable gases that can be stored in compressed aluminum cylinders. Because of this, cylinders can be filled with known concentrations and shipped to any location. Calibrations and verification are performed by injecting known VOCs stored in cylinders. For the CH₄/NMHC instrument, CH₄ and C₃H₈ are blended together in one (1) cylinder. Both are very stable gases that can be stored in compressed aluminum cylinders. For the BTEX instrument, the compounds are also blended together into one cylinder. The VOC concentrations, if high enough, can be stable in the cylinders for many years. Several gas vendors lease or sell cylinders that are traceable to the National Institute of Standards and Technology (NIST) traceable standards for CH₄/C₃H₈ and BTEX. In this manner, cylinders can be leased of known concentrations and taken to the ambient air monitoring locations throughout the State of Wyoming and utilized to calibrate, verify or audit the instruments in the field.

The CH₄/C₃H₈ hydrocarbon analyzers are calibrated using a gas cylinder with a certified concentrations of CH₄/C₃H₈, and using the in-line mass flow controlled dilution system.

For THC instruments, the GC stainless steel Inlet line is connected into the station intake manifold which transitions from 1/8" stainless steel to 1/4" PFA Teflon. The residence time of the analyzers will be maintained at less than twenty (20) seconds residence time requirement. THC probe siting information and site configuration for the monitoring are in accordance with 40 CFR Part 58 Appendix E³.

2.1 Definitions

The following terms that are used throughout this document are defined here:

- **NIST:** This acronym refers to the National Institute of Standards and Technology. This is a laboratory near Washington D.C. that creates standards for instruments and materials to government and non-governmental entities and also cooperates with other countries to create international standards. This is performed so that the value of one (1) thing in data collected anywhere in the world or US is comparable to the same information collected somewhere else.
- **NIST Traceability:** this term refers to a “transfer” of a standard or technique that allows the known standardization of one (1) material or instrument to another. In the case of THC and BTEX, this is done by using gas that has been tested by a NIST traceable instrument and then placed into a compressed gas aluminum cylinder. In addition, the flow rates of the mass flow calibration (MFC) unit is also calibrated using NIST traceable flow devices, so that the operator in the field will know what the level of gas that is being delivered to the within a known level of confidence. All THC instruments within the WDEQ-AQD jurisdiction are brought to NIST traceability.
- **One-point Quality Control (QC) check or Precision check:** This is a one-point calibration that is performed using a concentration that is usually set in the range where the instrument operates. This check is performed once every three (3) days using the MFC unit, which generates this point. These values are used for precision and bias calculations.
- **Mass Flow Controlled Calibration Unit:** The MFC is an instrument that can precisely control the flow of gases with its mixing chamber. Most MFC can have several high pressure gas cylinders attached to it and be able to blend those gases with purified air in ratios as low as 1000 to 1. In this way, only small amounts of gas are used and blended with large quantities of zero air to get concentrations in the ranges of the instruments. This is a very cost effective way to calibrate the instruments over a long period of time.

3.0 Health and Safety Warnings

The following health and safety warning must be followed in order for safe operation of the instrument.

- Nitrogen gas can displace oxygen, if you feel dizzy or get a headache, get outside or ventilate the indoors immediately.
- Gas cylinders should be properly secured at all times to prevent tipping, falling or rolling. They can be secured with straps or chains connected to a wall bracket or other fixed surface, or by use of a cylinder stand. THC and BTEX instruments generally operate using 110 V AC current. Therefore, if troubleshooting, be extremely cautions against electric shock. This can both harm a person and possibly harm the instrument.
- When generating blended gas, be sure to ventilate the working space thoroughly. CH₄ and C₃H₈ are often blended with other gases, such as sulfur dioxide (SO₂), nitric oxide (NO) and/or carbon monoxide (CO).
- Always use a third ground wire on all instruments.
- Always unplug the analyzer when servicing or replacing parts.
- Refer to the manufacturer's instruction manual and know the precise locations of these components before working on the instrument.
- Avoid electrical contact with jewelry. Remove rings, watches, bracelets, and necklaces to prevent electrical burns.

4.0 Cautions

The following precautions must be observed:

- The THC instruments utilize hydrogen (H_2) gas to operate a flame for the FID. H_2 is highly explosive and flammable. Extreme care and caution must be used to make sure that H_2 gas does not leak either in the room or in the instrument. If the operator thinks there is a leak, turn off the H_2 gas and troubleshoot immediately.
- The columns within the THC and BTEX instruments start at ambient temperatures and are heated to drive the VOCs from the columns. It is recommended that you allow the instruments to cool and to sit for a period of time before performing any repairs to the instrument.
- Keep the interior of the analyzer clean.
- Inspect the tubing within the instruments regularly for structural integrity.
- To prevent major problems with leaks, make sure that all sampling lines are reconnected after required checks and before leaving the site.

4.1 Interferences

THC instrument is subject to interference from water vapor (H_2O). H_2O is a by-product of the combustion process with the FID. If water vapor builds up in the reaction chamber, it can have a squelching effect on the analysis. Therefore, H_2O must be removed from the reaction chamber by maintaining proper flow through the instrument. BTEX instrument are known to have interferences with isomers of BTEX that elute through the columns at or near the same time as the BTEX compounds.

Compounds such as methylene chloride and acetone, which have similar molecular weights as the BTEX compounds can co-elute in the columns.

5.0 Personnel Qualifications

It is the responsibility of each agency or contractor to train their laboratory or field staff on instrument operation and maintenance. It is a requirement of the WDEQ-AQD that WDEQ-AQD staff, contractors and site operators keep records of all training that is performed. Although THC/BTEX instruments are self-contained, computer operated instrument, there is a level of knowledge of electronics and know-how involved in the operation and maintenance of the instrument. The instrument manual is the best training tool for this.

6.0 Equipment

WDEQ-AQD and its contractors specifically utilize best available instruments in their network. Neither the THC nor the BTEX instruments have Federally Reference or Equivalent Method requirements. The WDEQ-AQD has thoroughly vetted the instruments used in the network. Upon initial receipt, the THC and BTEX instruments should operate within the parameters set by the WDEQ-AQD program. These parameters are available in the operating manual that comes with the instrument. Thoroughly read and familiarize yourself with this instrument.

The following supplies and equipment are required for the operation of these instruments:

- **MFC calibration unit:** As mentioned above, these units blend gases precisely and allow the user to challenge the instruments with gas concentrations of known quantity and accuracy.
- **NIST traceable cylinders:** Numerous vendors can provide stable, NIST traceable cylinders with concentrations that can be periodically verified by the vendor.
- **Zero Air Generator:** Zero air is required for the calibration and establishing a baseline for the instruments. This air must be VOC-free to 0.1 ppmC (THC) or 0.1 ppbC (BTEX) and be free of water vapor.
- **Output Manifold:** The manifolds at all stations are constructed out of borosilicate glass. The instruments are attached to the lines using GC grade stainless steel lines.
- **Tubing and Fittings:** As mentioned above, the instruments are attached to the lines using gas chromatographic grade stainless steel lines. Teflon is an inert material however, VOCs can penetrate these lines. All fittings and ferrules must also be made of chromatographic grade stainless steel lines
- **In-Line Filters:** These are used to filter out particulate matter and water vapor in the inlet side of the tubing. These should be changed on a periodic basis.
- **Datalogger:** Capable of reading and sending data streams to and from the analyzer.

Spare parts for the continuous gas analyzers and particulate sampler will be stored in the monitoring shelter and central laboratory and will be used as needed. These spare parts include, but are not limited to, pump re-build kits, zero air scrubber material, various o-rings, chromatographic grade stainless steel lines fittings, ferrules.

6.1 Inspection/Acceptance of Supplies and Consumables

Spare parts will be purchased only from the instrumentation manufacturer by the Network Managers or the contractors. For the WEDQ –AQD operated sites; parts will be inspected by the Network Managers or site technician for shipping damage upon receipt. Spare parts will be kept in the monitoring shelter for use when needed. The use of spare parts will be documented on calibration forms.

The gaseous analyzers, the MFC calibrator, gas cylinders and zero-air system use inlet filters, Purafil, charcoal, and span gas. These supplies do not require acceptance testing. Inlet filters are replaced by the site operator approximately every site visit or as necessary. The Purafil and charcoal is replaced yearly or more frequently, as needed.

7.0 Quality Control Procedures

The procedures in this document describe in depth how the traceability to NIST standards is accomplished. In addition, these documents, “Series 9000 NMHC Methane/Non-Methane Analyzer Installation and User’s manual, 1143-154-D and Series 9100 GC-PID Gas Chromatograph Installation and User’s Manual 143-193,” are referenced in the writing of this SOP. Table 1 and Table 2, below, explain the QC procedures.

Table 1. THC and BTEX Instrument QC Procedures

Procedure	Frequency	Requirement
Visual Inspection of Equipment	Routine Site Visits; typically, once every month	As needed
Remote interrogation of monitoring station and inspection of data	Daily	QC Checks for data screening
Routine calibration	Once every three days	Meets MQO
Cylinder Certification	Depending on the mixture of gases in the cylinder, once every three years (specified on Certificate of Analysis).	Ship the cylinder to the gas vendor for recertification to NIST Traceable Standards or replace with newly certified cylinder(s)
Cylinder Gas Inspection	Monthly	Verify calibration gas cylinders are at or above 500 psi – replace if below. For carrier and detector gases, confirm pressure will be adequate for at least two months service.
Zero/span checks	Once every 3 days	Meets MQO
Precision checks	Once every 3 days	Meets MQO
Equipment Maintenance	As needed or as the operating manual recommends	See SOP and equipment manuals
In-line filter change	Every Site visit	As needed
Data validation	Daily and monthly	Electronic data screening Time/Parameter Plot visual check
	Quarterly	Data processing calculation check. Missing data confirmed. Offline periods confirmed. Confirmed data validation checklist.

Table 2. QA and QC Data Quality Requirements for CH₄/NMHC and BTEX Instruments

Frequency	Challenge	Acceptance and Action Level Criteria	Data Validation Acceptance Criteria
Quarterly or after failed QC check or maintenance	% difference during multipoint challenge	±10.1%	±15.1%
Multipoint Calibration	Linearity	±1.1%	±2.1%
Every 3 days	One Point QC Check (Precision Check)	±10.1%	±15.1%
Every 3 days	Zero Check	Less than 0.1 ppmC	Less than 1.0 ppmC for CH ₄ /NMHC/THC and less than 1.0 ppbC for BTEX
Every 3 days	Span Check (drift)	±8.1%	±15.1%
Quarterly	Data Completeness	Greater than 90%	NA

The identification, cause, and corrective action for conditions adverse to quality will be documented on the Corrective Action Report form in Appendix A of this SOP. Follow-up action will be taken by the Project Manager to verify the corrective action was taken.

7.1 Equipment Maintenance

Tables 3 and 4 illustrate the maintenance schedule that should be followed in order to maintain the instruments in good working order.

Table 3. Station Maintenance Activities

Maintenance Activity	Frequency
Sample intake manifold cleaning	As needed
Sample inlet tubing replacement	Annually or as needed
Monitoring shelter floor cleaning	Monthly or as needed
Monitoring shelter trash removal	As needed
Monitoring shelter light bulb replacement	As needed
Heating/AC system filter replacement	As needed
Main sample intake filter	Quarterly or as needed

Table 4. Equipment Maintenance Activities

Maintenance Activity	Frequency
THC Analyzer	
Check Air or fuel gas flows	Each Site Visit
Electrometer Cable connection	As needed
Check FID for cleanliness	Annually or as needed
Leak check	Annually or as needed
Check Temperature Set Point	Annually or as needed
Rebuild pump	Annually or as needed
Check internal fan	Monthly or as needed
BTEX Instrument	
Particulate filter	Quarterly or as needed
Sample Flow Calibration	Quarterly or as needed
Carrier Flow Calibration	Quarterly or as needed
Leak check	Annually or as needed
Check Temperature Set Point	Annually or as needed
Check internal fan	Monthly or as needed
Mass Flow Dynamic Gas Calibrator	
Verify Test Functions	After maintenance or repair
Perform Flow Check	Quarterly or as needed
Perform Leak Check	Annually or after maintenance
Examine Pneumatic Lines	Quarterly or as needed
Zero Air System	
Check tubing	Quarterly or as needed
Replace charcoal scrubber	Annually
Replace purafil	Annually
Replace HC scrubber	When contaminated
Replace regenerative dryer	When contaminated
Replace particulate filter on rear panel	Annually
Replace 4-way valve	Annually or as needed

Maintenance Activity	Frequency
Zero Air Generator (ZAG) verification	Annually

7.2 Particulate Filter Replacement

Particulate Matter (PM), i.e., dust and pollen, can be drawn into the station inlets and travel through the lines and can enter the instrument's chromatographic columns or FID. If this happens, the PM can block the columns or attenuate the FID flame. PM filters are placed in-line and remove the PM. Below is a procedure to replace the filters

1. Before proceeding, the channels must be flagged. The site operator will follow the specific procedures to flag the appropriate data channels based on the task being performed.
2. Open the PM filter holder. This is usually behind the instrument and near the inlet to the instrument.
3. Carefully remove the old filter. Examine it for pin holes and any tears in the material. Discard the old filter.
4. Carefully place a new filter into the filter holder and close the unit. If the filter holder is a screw type, do not over-tighten; this can cause the filter to tear.
5. If no check or calibrations are to be performed, then return the instrument channels on the DAS back to data collection status.
6. Enter into the station log that a filter change was performed. Note the date and time.

8.0 Precision (QC) Check

The procedure below describes the steps required to perform a single point QC (i.e., precision point) test. This can be accomplished by using: DAS, sampling lines, sampling manifold, NIST traceable cylinder, zero-air source, MFC unit and record forms. The MFC must deliver sample air to the analyzer at atmospheric pressure; therefore, a vent MUST be used in the line somewhere downstream of the analyzer inlet.

1. Before proceeding, the channels on the DAS must be flagged. Since DAS and programs often change, check with the site operator for specifics on flagging the appropriate data channels based on the task being performed.
2. When using the site MFC, no plumbing changes are required. Usually the vent is already installed in the system.
3. Begin by commanding a precision or “one point QC check” value from the site calibrator. This value should be in the range of 2.50 and 3.00 ppmC (for the THC analyzer) and 110 to 200 ppbC (for the BTEX instrument).
4. Allow ten (10) to fifteen (15) minutes for stabilization, and then record the analyzer response onto a data sheet.
5. End the generation of gas by pressing STBY.
6. Allow another five (5) minutes for the analyzer to re-stabilize to ambient air, and then remove the data system flag.
7. The one point QC checks are now complete. The analyzer response should be within ± 10 percent of the MFC calibration system calculated value. See Table 2 for details on these QC requirements.

In order to insure that high quality, accurate measurement information is obtained at all times, the analyzers must be calibrated when the instrument is newly installed, moved, repaired, interrupted for more than a few days, and quarterly. In addition, if results from the span or the one-point QC checks indicate a difference is greater than $\pm 15\%$, a new calibration will be performed.

9.0 Instrument Performance Calibrations Procedure

The basic sampling equipment and supplemental supplies that are needed to perform calibrations include: DAS, sampling lines, sampling manifold, NIST traceable cylinder, zero-air source, MFC unit and record forms.

9.1 Zero Calibration Procedure

1. Before proceeding, the appropriate channels on the DAS must be flagged.

After the DAS is flagged, begin by introducing zero air to the sample inlet of the analyzer. This can be accomplished by using the site calibration system or an external zero air source. Zero air or any sample gas must be delivered to the analyzer at atmospheric pressure; therefore, you MUST have a vent in the line somewhere downstream of the analyzer inlet. When using the site calibration system, no plumbing changes are required. You simply need to begin by commanding zero air from the site calibrator. The vent is already installed in the system. Begin flowing zero air, and wait for the analyzer to reach stability, usually around ten (10) minutes. Record the values in the appropriate calibration forms.

2. Press CAL then ZERO then ENTER to set the new zero level. If you decide you do not want to set the zero, press EXIT instead of ENTER.
3. Press EXIT after ENTER to leave the CAL menu.

9.2 Span Calibration

1. If not already flagged, flag the appropriate channels on the DAS for the station.
2. Just as with the zero, the site calibration system can be used or an external span gas source can be used.
3. Begin delivering CH₄ and CH₃H₈ (for THC instrument) and BTEX (for the BTEX instrument) at 85-90% of the URL of the analyzer. While awaiting system stabilization, set the EXPECTED span gas concentration into the analyzer.
4. Set the span value by pressing the buttons corresponding to each digit on the screen to change the value. This changes the actual analyzer internal slope and forces it to read at the previously set SPAN value.
5. Press ENTER to store the expected span value.
6. While still delivering the 85 - 90% URL gas concentration, and once stabilization has been reached, record the values onto the calibration form.
7. If it is decided that only a zero and span is to be performed, end the test and return the system to its normal operation mode. However, if the operator wishes to perform a multipoint calibration, continue on to step 8.
8. Adjust the delivery of CH₄ and CH₃H₈ (for THC instrument) and BTEX (for the BTEX instrument) at 40 - 50% of the URL of the analyzer. While awaiting system stabilization, set the EXPECTED span gas concentration into the analyzer.
9. Set the span value by pressing the buttons corresponding to each digit on the screen to change the value. This changes the actual analyzer internal slope and forces it to read at the previously set SPAN value.
10. Press ENTER to store the expected span value.

11. While still delivering the 40 - 50% URL gas concentration, and once stabilization has been reached, record the values onto the calibration form.
12. Adjust the delivery of CH₄ and CH₃H₈ (for THC instrument) and BTEX (for the BTEX instrument) at 8 - 10% of the URL of the analyzer. While awaiting system stabilization, set the EXPECTED span gas concentration into the analyzer.
13. Set the span value by pressing the buttons corresponding to each digit on the screen to change the value. This changes the actual analyzer internal slope and forces it to read at the previously set SPAN value.
14. Press ENTER to store the expected span value.
15. While still delivering the 8 - 10% URL gas concentration, and once stabilization has been reached, record the values onto the calibration form.
16. For each point, allow for approximately ten (10) minutes of stabilization before recording the value. Plot the analyzer responses versus the corresponding calculated concentrations to obtain the calibration relationships. Determine the straight line of best fit ($y=mx+b$) determined by the method of least squares.
17. After the best fit line has been drawn, determine whether the analyzer response is linear. To be considered linear, no calibration test point should differ from the best-fit line by more than 2% of full scale.

9.3 Method Detection Limit Test

The Method Detection Limit (MDL) is the lowest concentration of a substance that can be reliably determined (99% confidence) by a given procedure. Any measurement falling at or above the MDL reflects a concentration that is significantly different from zero at a 1% percent false positive rate. The Lower Detection Limit (LDL) should be 0.100 ppmC (100 ppbC) for the THC instrument. For the BTEX instrument the LDL is 2.0 ppbC. The operational MDL is not given by manufacturing. The vendors' advertised LDL, which is defined as the minimum concentration that produces a signal that is twice the noise level. Estimates of the LDL by sampling zero air and estimating the noise level according to 40 CFR 53.23 (b)⁴. The EPA specifies that the MDL must be established at the time the instrument is being brought on-line for data collection.

This is accomplished by supplying the analyzer at least seven times with a test atmosphere of trace level THC or BTEX. The Trace Level instrument at an NCore site will have an initial MDL determined and subsequent MDL determinations performed annually thereafter.

The MDL determination will be performed as follows:

1. Determine the concentration of the challenge gas to be introduced to the analyzer. This is defined as a value that is 2.5 to five (5) times the noise as provided by the manufacturer (see instrument manual). Since this is a MDL, the gases should be introduced at the sample inlet.
2. Establish and set the instrument "zero" using a source of pollutant free air. This is performed immediately prior to performing the MDL and can be associated with an instrument.
3. Please note that no adjustments to the instrument are allowed during the MDL study. If adjustments or maintenance is required for routine data collected, the MDL determination must be restarted.

4. Introduce the challenge gas to the analyzer through the sample inlet port for a time sufficient to allow the readings to stabilize plus at least thirty (30) additional minutes.
5. Collect, record and calculate the average of the last twenty (20) sixty-second averages using a spread sheet such as Excel. This will be data point number one.
6. A minimum of seven (7) data sets is required. Repeat step 2 - 5 above for six (6) additional days. This will result in seven (7) data points.
7. If the instrument is in service for ambient data collection, these events should be scheduled such that they do not interfere with other calibration check activities.

Calculate the MDL test as outlined in Reference 4.

10.0 References

1. QA Handbook for Air Pollution Measurement Systems: Volume II: Ambient Air Quality Monitoring Program, January 2017. https://www.epa.gov/sites/default/files/2020-10/documents/final_handbook_document_1_17.pdf
2. Technical Assistance Document For Precursor Gas Measurements in the NCore Multi-Pollutant Monitoring Network, Version 4, EPA-454/R-05-003 September 2005. <https://nepis.epa.gov/Exe/ZyNET.exe/P100ACLX.TXT?ZyActionD=ZyDocument&Client=EPA&Index=2000+Thru+2005&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C00thru05%5CTxt%5C0000027%5CPC100ACLX.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL>
3. Code of Federal Regulations Title 40 Part 58, Appendix E. <https://www.ecfr.gov/current/title-40/part-58/appendix-Appendix E to Part 58>
4. Code of Federal Regulations Title 40 Part 53.23 (b). [https://www.ecfr.gov/current/title-40/part-53#p-53.23\(b\)](https://www.ecfr.gov/current/title-40/part-53#p-53.23(b))

CH₄ & NMHC Calibration Forms



Trinity
Consultants

**METHANE, NON-METHANE, TOTAL
HYDROCARBON CALIBRATION
SHEET**

AS FOUND

SITE NAME _____
PROJECT _____
SITE OPERATOR _____

Analyzer Mfg _____
Analyzer Model _____
Analyzer s/n _____

Date _____ **Start Time** _____
Stop Time _____

Anal. Range 0- _____ **20** **PPM**

CALIBRATION EQUIPMENT:

Calibrator: _____
Model: _____
Serial #: _____
Cert Date: _____

Audit Gas: _____
Concentration: _____
Serial #: _____
Certification Date: _____
Expiration Date: _____

Zero Air Source: _____
Model: _____
Serial #: _____
Certification Date: _____

METHANE			NON-METHANE HYDROCARBON			TOTAL HYDROCARBON		
CAL INPUT (X) (PPM)	RESPONSE (Y) (PPM)	% DIFF.	CAL INPUT (X) (PPM)	RESPONSE (Y) (PPM)	% DIFF.	CAL INPUT (X) (PPM)	RESPONSE (Y) (PPM)	% DIFF.
		---			---			---

Calibration Regression Analysis: Corr. Analyzer Response (Y)=m(calib input(X))+b

	CH ₄	NMHC	THC	
Slope (m)				1.05 to 0.95
Intercept (b)				(≤ ± 10)
Correlation Coefficient (r)				(≥ 0.995)
Average % Difference				

Calibrated By _____ = cell containing equations

Air Resource SPECIALISTS		CH₄ & NMHC ANALYZER VERIFICATION & CALIBRATION (AS FOUND)																	
ABBR.		CLIENT		FIELD SPECIALIST	DATE														
SITE NAME			DATE OF LAST VISIT																
AS FOUND																			
		AMBIENT ANALYZER	GAS DILUTION SYSTEM	HYDROGEN	Pressure														
Manufacturer	Baseline-MOCON			Cylinder SN															
Model				Cylinder SN															
Serial Number				Cylinder SN															
Methane Gain			CALIBRATION GAS																
Non-methane Gain			Cylinder SN																
Purge time (sec)			Expiration Date		ppmC														
CH ₄ Dwell / Non-CH ₄ Dwell (min)			Cylinder Pressure	CH ₄ Conc.	0.0														
Fuel Flow (ccm)			Delivery Pressure	Non-CH ₄ Conc.	0.0														
Air Flow (ccm)			CH ₄ Conc. (ppm)	CH ₄ Span															
Sample Flow (ccm)			C ₂ H ₄ Conc. (ppm)	Non-CH ₄ Span															
Fuel Pressure (psi)																			
Air Pressure (psi)																			
Methane Zero Current (A)			From Previous Visit																
Methane Span Current (A)																			
Non-Methane Zero Current (A)																			
Non-Methane Span Current (A)																			
CALIBRATION ACCEPTANCE CRITERIA (+/-)																			
Mean Absolute Difference (%)				5%															
Maximum Absolute Difference (%)				5%															
DATA ACCEPTANCE CRITERIA (+/-)																			
Mean Absolute Difference (%)				15%															
Maximum Absolute Difference (%)				15%															
Full Scale (ppmC)																			
		GAS DILUTION		METHANE (ppmC)			NON-METHANE (ppmC)			THC (ppmC)									
POINT	TARGET	Z-air Flow	Gas Flow	Target	DAS	DIT	%DIT	LINEAR%	Target	DAS	DIT	%DIT	LINEAR%	Target	DAS	DIT	%DIT	LINEAR%	
ZERO	0						N/A					N/A						N/A	
1	0.00																		
2	0.00																		
3	0.00																		
4	0.00																		
5	0.00																		
ZERO	0						N/A					N/A						N/A	
				Mean ABS % Difference				Mean ABS % Difference				Mean ABS % Difference							
				Max ABS % Difference				Max ABS % Difference				Max ABS % Difference							
				Slope				Slope				Slope							
				Y-Intercept				Y-Intercept				Y-Intercept							
				Correlation				Correlation				Correlation							
NOTES:																			

Air Resource SPECIALISTS		CH₄ & NMHC ANALYZER VERIFICATION & CALIBRATION (AS LEFT)																	
ABBR.			FIELD SPECIALIST	DATE															
CLIENT			DATE OF LAST VISIT																
SITE NAME																			
AS LEFT																			
		AMBIENT ANALYZER	GAS DILUTION SYSTEM	HYDROGEN	Pressure														
Manufacturer	Baseline-MOCON			Cylinder S/N															
Model				Cylinder S/N															
Serial Number				Cylinder S/N															
Methane Gain			CALIBRATION GAS																
Non-methane Gain			Cylinder S/N																
Purge time (sec)			Expiration Date		ppmC														
CH ₄ Dwell / Non-CH ₄ Dwell (min)			Cylinder Pressure	CH ₄ Conc.															
Fuel Flow (ccm)			Delivery Pressure	Non-CH ₄ Conc.															
Air Flow (ccm)			CH ₄ Conc. (ppm)	CH ₄ Span															
Sample Flow (ccm)			C ₂ H ₄ Conc. (ppm)	Non-CH ₄ Span															
Fuel Pressure (psi)																			
Air Pressure (psi)																			
Methane Zero Current (A)			From This Visit																
Methane Span Current (A)																			
Non-Methane Zero Current (A)																			
Non-Methane Span Current (A)																			
CALIBRATION ACCEPTANCE CRITERIA (±%)																			
				Mean Absolute Difference (%)	5%														
				Maximum Absolute Difference (%)	5%														
DATA ACCEPTANCE CRITERIA (±%)																			
				Mean Absolute Difference (%)	15%														
				Maximum Absolute Difference (%)	15%														
Full Scale (ppmC)																			
		GAS DILUTION	METHANE (ppmC)				NON-METHANE (ppmC)				THC (ppmC)								
POINT	TARGET	Z-air Flow	Gas Flow	Target	DAS	Dif	%Dif	LINEAR%	Target	DAS	Dif	%Dif	LINEAR%	Target	DAS	Dif	%Dif	LINEAR%	
ZERO	0						N/A					N/A						N/A	
1	0.00																		
2	0.00																		
3	0.00																		
4	0.00																		
5	0.00																		
ZERO	0						N/A					N/A						N/A	
				Mean ABS % Difference				Mean ABS % Difference				Mean ABS % Difference							
				Max ABS % Difference				Max ABS % Difference				Max ABS % Difference							
				Slope				Slope				Slope							
				Y-Intercept				Y-Intercept				Y-Intercept							
				Correlation				Correlation				Correlation							
NOTES:																			

Appendix A.2 Standard Operating Procedure for Performance Evaluations of Gaseous Analyzers

**Wyoming
Department of Environmental Quality
Air Quality Division**



WYOMING DEPARTMENT OF
ENVIRONMENTAL
QUALITY

**Standard Operating Procedure For
Performance Evaluations of Gaseous Analyzers**

**November 2025
Revision 4**

1.0 Scope and Applicability

This SOP applies to the quality assurance activities involving the performance evaluations of gaseous analyzers within the WDEQ-AQD air quality monitoring network. Performance evaluations are required by 40 CFR Part 58 Appendix A for comparison to the NAAQS. They must be completed annually at a minimum. This SOP details the procedures WDEQ-AQD will take to prepare and perform the performance evaluations in the field. Occasionally, the WDEQ-AQD may contract out the performance evaluations. If this is the case, the Contractor may have their own SOP to follow. This SOP does not pertain to the National Performance Audit Program (NPAP) or Through the Probe (TTP) audits.

1.1 Introduction

Performance evaluations are performed with independent equipment and personnel from data generation. For WDEQ-AQD, the QA Coordinator or designated Contractor will travel to the site location with independent equipment to perform the audit. The audit is performed by using a certified gas cylinder independent from the site, an independent source of zero air, and an independent gas calibration system with a certified ozone photometer.

It is a requirement for comparison to the NAAQS, that the criteria pollutant analyzers are audited annually at a minimum and quarterly at NCore locations.

2.0 Summary of Method

This method is for use for auditing WDEQ-AQD gaseous analyzers. The parameters to be audited include ozone, sulfur dioxide, carbon monoxide, nitrogen dioxide, and hydrocarbons. Audits will be performed quarterly or semi-annually depending on the station.

2.1 Definitions

The following terms that are used throughout this document are defined here:

- **NIST:** This acronym refers to the National Institute of Standards and Technology. This is a laboratory in Washington D.C. that creates standards for instruments and materials for government and non-governmental entities and also cooperates with other countries to create international standards. This is performed so that a value of one thing in data collected anywhere in the world or U.S. is comparable to the same information collected somewhere else.
- **NIST Traceability:** This term refers to a “transfer” of a standard or technique that allows the known standardization of one material or instrument to another. For example with sulfur dioxide, this is done by using sulfur dioxide gas that has been tested by a NIST traceable instrument and then placed into a compressed gas aluminum cylinder. In addition, the flow rates of the mass flow calibration (MFC) unit is also calibrated using NIST traceable flow devices, so that the operator in the field will know the level of gas that is being delivered within a known level of confidence. All gaseous analyzers within the WDEQ-AQD network are NIST traceable.
- **Mass Flow Controlled Calibration Unit:** The MFC is an instrument that can precisely control the flow of gases with its mixing chamber. Most MFC can have several high pressure gas cylinders attached to it and be able to blend those gases with purified air in ratios as low as 1000 to 1. In this way, only small amounts of sulfur dioxide are used and blended with large quantities of zero air to get concentrations in the ranges of the instruments. This is a very cost effective way to calibrate the instruments over a long period of time.

3.0 Health and Safety Warnings

The following health and safety warning must be followed in order for safe operation of the instrument.

- Analyzers generally operate using 110 V AC current. Therefore, if troubleshooting, be extremely cautious against electric shock. This can both harm a person and possibly harm the instrument.
- SO₂ and O₃ analyzers use a pulsed Ultraviolet (UV) lamp within the optics portion of the instrument. Do not look directly at the lamp if it is lit. The UV can burn your retinas and cause blindness.
- When generating any gas, be sure to ventilate the area thoroughly. NIST traceable gas cylinders are often blended with gases, such as sulfur dioxide (SO₂), carbon monoxide (CO), nitric oxide (NO), nitric oxides (NO_x), methane (CH₄), and/or Propane (C₃H₈). If possible, vent all excess calibration gas outside and avoid breathing it if possible. SO₂, CO and NO can be hazardous and damage lung tissues.
- Always use a third ground wire on all instruments.
- Always unplug the analyzer when servicing or replacing parts
- If it is mandatory to work inside an analyzer while it is in operation, use extreme caution to avoid contact with high voltages inside the analyzer. The analyzer has high voltages in certain parts of the circuitry, including a 110 volt AC power supply that drives the UV lamp voltage. Refer to the manufacturer's instruction manual and know the precise locations of these components before working on the instrument.
- Avoid electrical contact with jewelry. Remove rings, watches, bracelets, and necklaces to prevent electrical burns.

4.0 Cautions

- The photomultiplier tube (PMT) within the instrument is very fragile. Use extreme caution when handling the PMT.
- Keep the interior of the audit equipment clean.
- Inspect the tubing within the instruments regularly for structural integrity.
- To prevent major problems with leaks, make sure that all sampling lines are reconnected after required checks and before leaving the site.

4.1 Interferences

The audit criteria for each point takes into account the use of independent equipment and any possible interferences.

5.0 Personal Qualifications

It is the responsibility of WDEQ-AQD or the Contractor to train their auditing staff on instrument operation and maintenance. It is a requirement of the WDEQ-AQD to train their staff and keep records of all training that is performed. Although the analyzers are self-contained, computer operated instrument, there is a level of knowledge of electronics and know-how involved in the operation and maintenance of the instrument. The instrument manual is the best training tool for this.

6.0 Equipment

The following supplies are required for the operation of this instrument:

- **Level 2 Ozone Photometer (Teledyne 400E Ozone Analyzer):** This unit is certified by the EPA annually and is used to certify the level 3 ozone photometer for field audits.
- **Dilution Calibrator/Level 3 Ozone Photometer (Teledyne 700EU Dynamic Dilution Calibrator):** These units use MFCs to blend and dilute gases precisely and allow the user to challenge the analyzers with gas concentrations of known quantity and accuracy. The unit also has the capability of generating known concentrations of ozone and allows the user to challenge the ozone analyzer and NO₂ analyzer.
- **NIST traceable gas cylinder:** Numerous vendors can provide stable, NIST traceable blended gas (SO₂, CO, NO, NO_x, CH₄ and/or C₃H₈) cylinders with concentrations that are periodically verified by the vendor.
- **Zero Air Generator (Teledyne 701 Zero Gas Generator):** Zero air is required for the calibration of sulfur dioxide instruments. This air must be free of ozone, NO, NO₂, and SO₂ to 0.001 ppm and CO and non-methane hydrocarbons to 0.1 ppm or below the instruments detection limit (whichever is lower). They must also be free of water vapor and particulates.
- **BIOS Defender Flow Meter:** NIST traceable standards used to calibrate the MFCs located in the calibrator.
- **Tubing and Fittings:** Teflon is an inert material that is used exclusively throughout the system. All fittings and ferrules must also be made of PFA or PTFE Teflon.

6.1 Inspection/Acceptance of Supplies and Consumables

Spare parts will be purchased only from the instrumentation manufacturer by the QA Coordinator. Parts will be inspected by the QA Coordinator for shipping damage upon receipt. Spare parts will be kept in the WDEQ-AQD workshop for use when needed.

The gaseous analyzers, the multi-gas calibrator, gas cylinders and zero-air system use inlet filters, Purafil, charcoal. These supplies do not require acceptance testing. The Purafil and charcoal are replaced yearly or more frequently, as needed.

7.0 Quality Assurance Procedures

Performance evaluations are required to be performed at a minimum of annually for SLAMS/SPMS and quarterly for NCore sites. The WDEQ-AQD will perform performance evaluations within the network semi-annually for SLAMS/SPMS locations and quarterly for the Cheyenne NCore and Boulder locations.

The performance evaluations are made by challenging the gaseous analyzers with audit gas standards of known concentrations from a minimum of three (3) audit levels. The audit levels are listed in Table 1. The audit points chosen should reflect the following as stated in 40 CFR Part 58 Appendix A 3.1.2.1:

1. One (1) point must be within 2-3 times of the method detection limit of the instruments within the PQAO network (Note: This will be limited by the starting gas concentration and the limitations of the MFCs within the calibrator).
2. The second point will be less than or equal to the 99th percentile of the data at the site or network of sites in the PQAO or the next highest audit concentration level.
3. The third point can be around the primary NAAQS or the highest 3-year concentration at the site or network of sites in the PQAO.

Passing criteria for audits are based on the gas and audit level.

- O₃, SO₂, NO₂: Audit levels 3-10 → 15.1%; Audit levels 1-2 → 1.5 ppb or 15.1%, whichever is greater
- CO: Audit levels 3-10 → 15.1%; Audit levels 1-2 → 0.031 ppm or 15.1%, whichever is greater
- NO, NO_x, NO_y, NO_y-NO, CH₄, NMHC, THC: No audit criteria, however a good target is within 15.1%.

Table 1. Audit levels listed in 40 CFR Part 58 Appendix A

Audit Level	Concentration Range (ppm)			
	O ₃	NO ₂	SO ₂	CO
1	0.004 - 0.0059	0.0003 - 0.0029	0.0003 - 0.0029	0.020 - 0.059
2	0.006 - 0.019	0.0030 - 0.0049	0.0030 - 0.0049	0.060 - 0.199
3	0.020 - 0.039	0.0050 - 0.0079	0.0050 - 0.0079	0.200 - 0.899
4	0.040 - 0.069	0.0080 - 0.0199	0.0080 - 0.0199	0.900 - 2.999
5	0.070 - 0.089	0.0200 - 0.0499	0.0200 - 0.0499	3.000 - 7.999
6	0.090 - 0.119	0.0500 - 0.0999	0.0500 - 0.0999	8.000 - 15.999
7	0.120 - 0.139	0.1000 - 0.2999	0.1000 - 0.1499	16.000 - 30.999
8	0.140 - 0.169	0.3000 - 0.4999	0.1500 - 0.2599	31.000 - 39.999
9	0.170 - 0.189	0.5000 - 0.7999	0.2600 - 0.7999	40.000 - 49.999
10	0.190 - 0.259	0.8000 - 1.000	0.8000 - 1.000	50.000 - 60.000

7.1 Instrument Setup and Calibrations prior to Performance Evaluations

The dilution calibrator, which is used in field audits, contains mass flow controllers, an ozone photometer and an ozone generator. It is critical for the performance evaluations that work be done to calibrator and verify the dilution calibrator prior to entering the field.

7.1.1 Equipment Setup in WDEQ-AQD Workshop

WDEQ-AQD has a workshop space to perform the activities needed in preparation for field audits. At this site, the zero air generator, level 2 ozone photometer and dilution calibrator are set up on a stand. Using the following set up to ensure equipment is connected properly.

1. Place all instruments on rack in workshop
2. Connect dilution calibrator to the level 2 ozone photometer using one of the ports labeled CAL OUT on the dilution calibrator and the SAMPLE port on the level 2 ozone photometer. See Figure 1 and Figure 2.
3. Connect the zero air generator to the dilution calibrator and level 2 ozone photometer using a T.
 - a. The port on the dilution calibrator is labeled DILUENT IN. See Figure 2.
 - b. The port on the level 2 ozone photometer is labeled ZERO AIR DRY AIR.
 - i. Using a T with a vent, connect a rotometer to make sure excess air is supplied to the analyzer. This can be adjusted once analyzer is properly warmed up.
 - c. Finger tighten the fitting and then use a properly sized wrench to make an additional 1 and ¼ turn.
4. Attach a line to vent the dilution calibrator with the minimum O.D. being 3/8 inch.
5. Plug in all three (3) instruments and turn on the Dilution Calibrator and Zero Air Generator. Let them warm up for a minimum of one (1) hour.

- a. DO NOT turn on the Level 2 Ozone Photometer until the Dilution Calibrator is generating ozone or 0.0 ppb ozone.

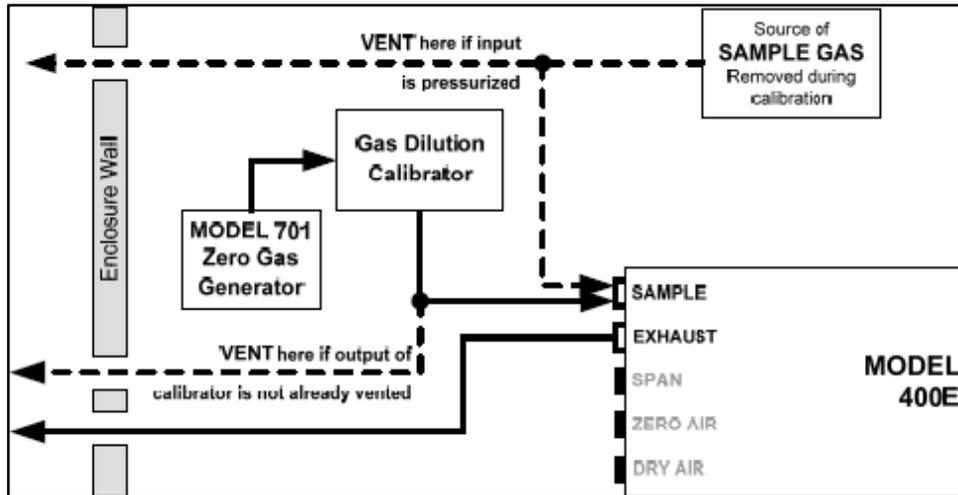


Figure 1. Connections with level 2 ozone photometer

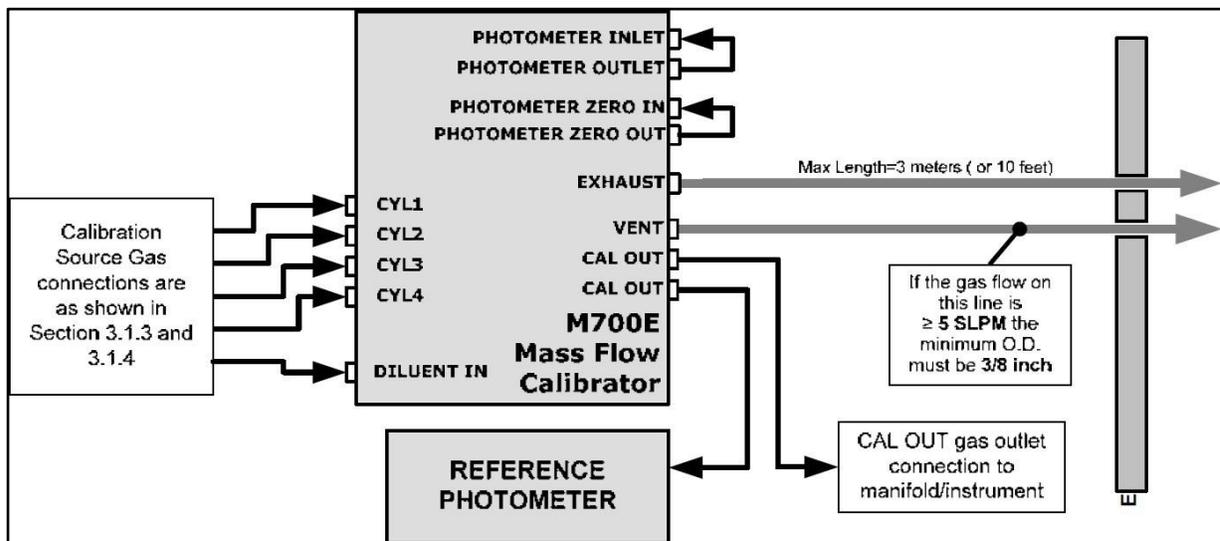


Figure 2. Connections with dilution calibrator

7.1.2 Calibrating MFCs in Calibrator

According to the instrument manual for the dilution calibrator, the MFCs should be verified periodically and calibrated if necessary. By verifying, and adjusting when necessary, the MFCs, the auditor can be confident that the concentrations of gas delivered to the analyzer are accurate. The MFCs should be verified at a minimum of every six (6) months, but ideally quarterly.

1. The BIOS flow meters are required for this procedure.
 - a. To setup the BIOS after recertification
 - i. Setup→Reading→Type:STD→Exit
 - ii. Units→SL/min flow in and Std T: 25C→Confirm to save
 - iii. Preferences→Read default Burst => Ten (10) readings average
2. Open the front panel to the dilution calibrator to access the MFC output ports
3. Attach the proper BIOS flow meter directly to the output port of the MFC to be checked. See

Figure 3.

- a. Note that the Diluent MFC will use the BIOS 220H model and the Cal Gas MFCs will use the BIOS 220L model.

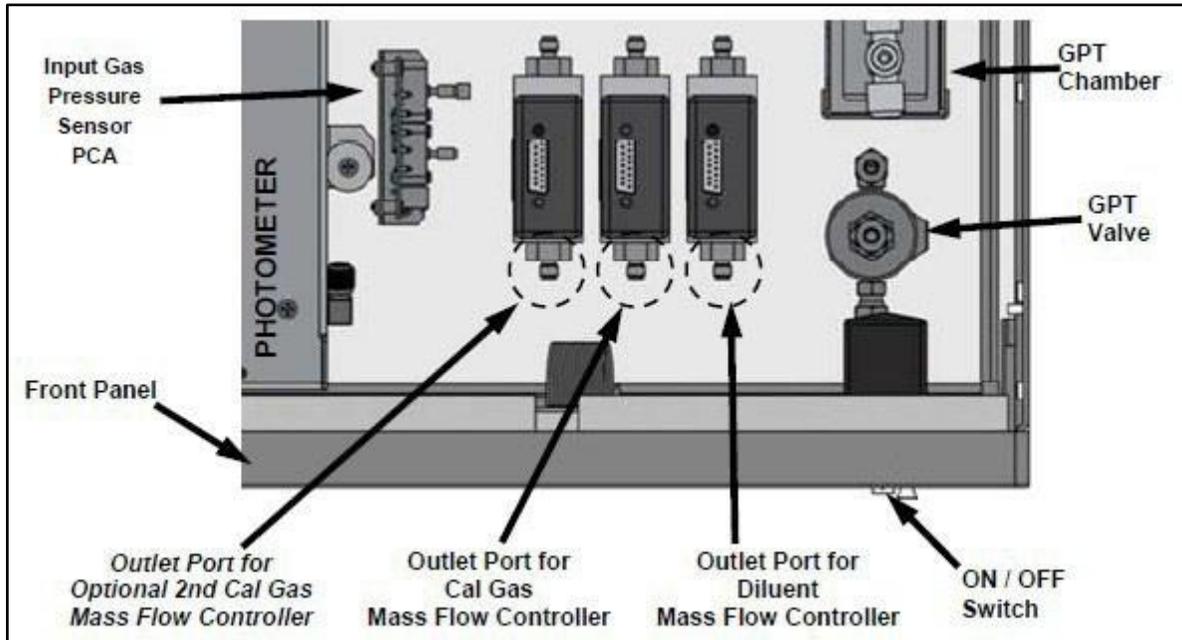


Figure 3. Diagram of mass flow controllers within a dilution calibrator

4. Turn on the BIOS flow meter
5. Perform the following steps to verify and/or calibrate the MFCs
 - a. Make sure Calibrator is in standby mode. If it is not, put into standby with **STBY** key.
 - b. → **SETUP** to access the **PRIMARY SETUP MENU**
 - c. → **MORE** to access the **SECONDARY SETUP MENU**
 - d. → **DIAG** → **ENTER PASSWORD 929** → **ENTR** will bring up **SIGNAL I/O** submenu
 - e. → **NEXT** (continue pressing NEXT) to access the **MFC CONFIGURATION** submenu
 - f. → **ENTR** This will bring up the first MFC, **DIL1** (other options are **CAL1** or **CAL2**). Select the MFC desired by using the **<SET SET>** keys.
 - g. → **EDIT** → **SET** until **DIL1 Table** is shown This will bring up the table for the MFC selected
 - i. If the MFC is **OFF**, press **OFF** to turn the key to **ON**
 - h. Enter the **DRV** and **FLW** for the calibration point on the MFC Verification and Calibration Form.
 - i. On BIOS: press Start to begin the Burst readings and wait until the readings are completed. Record the flow on the MFC Verification and Calibration Form.
 - i. When doing **CAL2** this may take a while, it is not necessary to wait for all ten (10) readings for the really low flow points if the readings are very close together.
 - j. If the average flow from the BIOS is within 2% of the value on the calibrator, no adjustment is needed. If the average flow from the BIOS differs by more than 2% use the following steps to make the adjustment.
 - i. → **Flow** → Toggle keys to match the average flow from the BIOS → **ENTR** to save
 - k. → **NEXT** will move to next calibration point
 - l. Repeat steps h-k for all twenty (20) points for the MFC
 - m. Once all points have been verified and necessary adjustments made → **EXIT** → **SAVE CHANGES?** → **YES**

- n. Disconnect BIOS flow meter from MFC and proceed to connect to next MFC.
 - i. Note that the Diluent MFC will use the BIOS 220H model and the Cal Gas MFCs will use the BIOS 220L model.
- o. Repeat steps f-n for the other MFCs
 - i. Note gas source must be connected to CYL1 port for gas MFCs to work.

7.1.3 Verification and Reverification of the Level 3 Ozone Field Transfer Standard

The Ozone Level 3 Field Transfer Standard is required to be verified at a minimum of every six (6) months. Due to the drift that can occur in the transport to and from the field, verifications can be performed more often or done quarterly. The verification and reverifications must be made against an Ozone Level 2 Bench Transfer Standard (which must have a current verification to an Ozone Level 1 Standard Reference Photometer (SRP)). The verification and reverifications will result in a linear regression relationship of the Level 3 Transfer Standard to the Level 2 Transfer Standard. This procedure is based off of the Ozone TAD document.

1. Follow section 7.1.1 of this SOP to set up equipment.
2. While equipment is warming up, review all preventive maintenance documentation for the Level 3 Field Transfer Standard/Dilution Calibrator.
3. After performing preventive maintenance to the Level 3 Field Transfer Standard/Dilution Calibrator, start generating 0.0 ppb ozone. Once generating ozone, turn on the Level 2 Transfer Standard and let warm up for ~1 hour.
 - a. On the Dilution Calibrator
 - i. **→GEN→AUTO→press gas key until O3**
 1. Enter 0.0 ppb O3
 2. Enter Flow Rate (i.e., 7.000 LPM, use the same flow rate every verification/reverification)
4. If performing a reverification, review the previous verification data, verification history, as-left internal calibration factors from the verification, and the current internal calibration factors.
 - a. If the internal calibration factors have changed, determine why they have changed and if the transfer standard has been used subsequently. Changing the internal calibration factors in a transfer standard voids the previous verification.
5. Once the equipment (Level 3 Transfer Standard/Dilution Calibrator) is warmed up, perform acceptance testing and fill out the Acceptance Testing Form.
 - a. Acceptance testing is required upon receiving a transfer standard and prior to verifications and reverifications.
 - b. This is done to ensure the transfer standard is operating within the manufacturer's specifications.
 - c. Acceptance testing should include:
 - i. Documentation of testing date, time, operator, instrument make/model/serial number (SN);
 - ii. Documentation ensuring routine maintenance required by the instrument manual has been performed;
 - iii. Direct comparison of sensors impacting the measurement (i.e., sample pressure, sample temperature, analog outputs) if recommended by the instrument manual or if sensor adjustment is required;
 - iv. Documentation of diagnostic parameters in the instruments' menu system and comparison to the manufacturer's specifications (i.e., sample pressure, sample temperature, flow);
 - v. Review and verify that all acceptance test data are within acceptable limits.
6. Begin by filling out the Ozone Verification/Reverification Form. This form is from the EPA and

- will be utilized for the verification and reverification process.
7. Determine the calibration scale and verification points:
 - a. Take the previous three (3) years of 1-hour values for all WDEQ-AQD sites. Determine the highest value.
 - i. EXAMPLE: For the year 2021, the highest value was 0.129 ppm and occurred at the Boulder Station in 2019.
 - b. Multiple the highest value by 1.5 to establish the calibration scale. If the highest point is below the NAAQS, use 1.5 times the controlling NAAQS.
 - i. The highest point used for the Level 3 Transfer Standard must be less than the highest point used in the Verification/Reverification of the Level 2 Transfer Standard.
 - ii. EXAMPLE: Taking the number above (0.129 ppm) * 1.5 = 0.1935 ppm. To simplify calculations, the high end point will be 0.200 ppm.
 - c. Five (5) additional points will be evenly spaced out between the calibration scale point and zero, for a total of six (6) verification points and a zero.
 - i. EXAMPLE: An acceptable six (6) verification points using the above calculation could be 0.200, 0.160, 0.120, 0.090, 0.060, 0.030, 0.000 ppm
 8. For a Verification: Run at least three (3) complete cycles consisting of a minimum of six (6) concentration points and a zero. See above Step 6 for determining the concentration points. See Step 10 for how to run points on the transfer standard.
 9. For a Reverification: Run one cycle consisting of a minimum of six (6) concentration points and a zero. See above step 6 for determining the concentration points. See Step 10 for how to run points on the transfer standard.
 10. Steps to run a concentration point on the Level 3 Transfer Standard:
 - a. Make sure that the dilution calibrator is in **STANDBY** mode or press **STBY**
 - b. **→GEN→AUTO→ZERO** toggle this key to scroll through the available gas types (as programmed during initial set up, See Section 7.2.1 if no gas types are programmed) and continue until **O3** is selected. Toggle keys to set target concentration and unit. See steps for determining the concentrations to run.
 - c. **→ENTR→Set TOTAL FLOW**
 - i. 7.0 LPM is a good starting point for the flow rate. If an MFC warning appears, the flow rate should be adjusted.
 - d. **→<SET** press this key until the **ACT** test function is displayed
 - e. Wait a minimum of ten (10) minutes or until the **ACT** reading settles down
 - f. Record the readings for the O₃ concentration readings displayed by the **ACT** test function and the level 2 ozone transfer standard.
 - i. Ten (10) points can be recorded and averaged for each concentration point, but this has to be done outside of the Ozone Verification/Reverification Form from the EPA.
 - g. Repeat this procedure for the concentration points determined in Step 6 and the number of cycles necessary for a verification or reverification.
 - h. The Ozone Verification/Reverification Form will perform all the necessary calculations.
 11. After cycle/cycles are completed, review the data and verify that the meet the following acceptance criteria:
 - a. Each point difference must be $<\pm 3.1\%$ or 1.5 ppb for concentrations below 50 ppb.
 - b. All Regression Slopes must be 1.00 ± 0.5
 - c. All Regression Intercepts must be 0 ± 3 ppb
 - d. Standard Deviation of the three (3) Slopes must be $<\pm 0.0075$
 - e. Standard Deviation of the Intercepts must be $<\pm 1.00$ ppb
 - f. For a Verification: The three (3) cycles regression slopes and intercepts are used to generate the 95% predication interval specific to that standard. The standard specific

- prediction intervals are used when assessing the results of a reverification.
- g. For a Reverification: The regression slope and intercept must fall within the transfer standards specific 95% prediction interval determined by the most recent three (3) cycles (not updated with current cycle until acceptance criteria is met).
 - i. If the results pass all criteria and are within the 95% prediction interval, then the transfer standard passes the reverification.
 1. A new prediction interval is calculated using the most recent three (3) cycles. The updated prediction intervals are used as the prediction interval acceptance criteria when assessing the results of the next reverification.
 - ii. If the results are outside of the 95% prediction interval, then the transfer standard must be assessed to determine what caused a shift in the results and a new verification must be performed if the investigation requires repair or adjustment of internal calibration factors.
12. Ensure that all documentation is complete and all records are saved to the appropriate location. Place a summary report on the verified transfer standard which includes:
- a. Date of verification
 - b. Date of verification expiration
 - c. Name of person conducting the verification
 - d. Make/model/SN
 - e. Current internal calibration factors
 - f. Dates/slopes/intercepts of the original verification cycles
 - g. Average slope and intercept
13. The linear regression slope and intercept will be used to correct ozone concentrations when performing a performance evaluation.

7.2 Field Audits

Field audits are performed by bringing an independent zero air source/generator, dilution calibrator, and gas cylinder to the field site. Three audit points and a zero point must be run for each analyzer. This information confirms that the site equipment is operating properly. If an analyzer fails the audit, a corrective action must be issued and resolved and the analyzer must be audited after.

7.2.1 Equipment Setup

Prior to running any audit points, all of the equipment must be set up, turned on and warmed up.

1. Connect the audit zero air generator to the audit dilution calibrator using the port labeled DILUENT IN. See Figure 2.
 - a. Finger tighten the fitting and then use a properly sized wrench to make an additional 1 and $\frac{1}{4}$ turn.
2. Plug both the audit zero air generator and audit dilution calibrator into a power source. Turn both on and let warm up for approximately one (1) hour (or until the box temperature of the dilution calibrator is above 20°C at a minimum).
3. Set up and purge gas cylinder
 - a. The gas regulator may be already installed on the cylinder and a DOT cylinder cap can be used for transport of the cylinder with the regulator installed. If not installed, install the regulator on the gas cylinder.
 - b. Attach a stainless steel line to the gas regulator.
 - c. Purge the gas cylinder approximately ten (10) times. This is really important for gas cylinders with NO in them.
 - i. Make sure the outlet valve on the regulator is closed

- ii. Open the tank valve to pressurize
 - iii. Close the tank valve
 - iv. Slowly open the outlet valve on the regulator and watch the pressure gauges drop to zero. Right before the second pressure gauge hits zero, close the outlet valve.
 - v. Repeat 7-10 times
 - d. Attach gas cylinder to audit dilution calibrator using the port labeled CYL1. See Figure 2. Allow gas to slowly run through stainless steel line while attaching. Once attached, open valve on regulator to let ~30 psi of gas to the calibrator
 - e. Program in the gas cylinder for the audit dilution calibrator. Note, if this step is previously done, you don't need to repeat it. The instrument will store the gas cylinder information.
 - i. **→SETUP→GAS→CYL→PRT1**
 1. Use **NEXT** or **ADD GAS** keys
 2. Enter in cylinder contents
 - ii. This will allow for the dilution calibrator to make the correct dilutions of cylinder gas and zero air.
4. Once equipment is set up and warmed up, use the data logger to flag the required channels
 - a. Most of the time the O₃/SO₂/CO/NO/NO_x/NO₂/CH₄/NMHC/THC sample lines T together to have one (1) tube for the inlet to the site dilution calibrator. These channels all have to be flagged at the same time for the audit. This goes for any site where sample lines T together.
 - b. The NO/NO_y analyzer will be separate and will be flagged only when auditing.
5. Detach the CAL OUT or OUTPUT A line from the site dilution calibrator and attach it to the audit calibrator. Now the flow of audit gas goes from the gas cylinder through the audit dilution calibrator to the site analyzers and is then vented out the site analyzer.
 - a. There are other possible ways to connect to the site analyzers, just ensure that there is a vent on the system or the audit system. There should only be one (1) vent, but there has to be a vent.
6. Determine the total flow required by the system.
 - a. Add the gas flow requirements for each of the analyzers in the system.
 - i. This can be found using the **<TST TST>** keys on the front of the Teledyne analyzers and scrolling.
 - ii. Take into account the 800 cc/min for the ozone photometer for the audit dilution calibrator
 - b. Multiply by 1.5
 - c. Using this calculation will ensure that more than enough gas is being supplied to each analyzer.
 - d. For all WDEQ-AQD sites, 7.0-7.5 LPM should be sufficient.
7. Check the diluent pressure on the audit dilution calibrator by using the **<TST TST>** keys to scroll until DIL PRESSURE appears. This pressure should be around 30 psi or the zero air will need to be adjusted. Start low on the pressure and slowly increase, if the pressure goes over 30 psi, you may have to bleed off the excess.
8. Check the cal gas pressure on the audit dilution calibrator by using the **<TST TST>** keys to scroll until CAL PRESSURE appears. This pressure should be around 30 psi or the gas cylinder regulator will need to be adjusted. Start low on the pressure and slowly increase, if the pressure goes over 30 psi, you may have to bleed off the excess.

7.2.2 SO₂, CO, NO_x, Total Hydrocarbons (THC) Analyzers Audit

The SO₂, CO, NO/NO_x and THC analyzers should be all in line together and connected to the site dilution

calibrator with one (1) line. If they are not in this configuration, then they will have to be audited separately.

1. Using Table 1 and historic data, determine the audit points desired for each analyzer. All analyzers can be audited simultaneously with proper planning and the proper mixed gas cylinder.
2. Zero air audit point: This can be performed for O₃ as well if following these steps
 - a. **→GEN→AUTO→Press gas key until ZERO**
 - b. **→ENTER→FLOW RATE**
 - i. See above 7.2.1 step 6 for determining the proper flow rate for the system
 - c. **→ENTER**
 - i. The system should now be generating zero air
 - d. Let point stabilize for 10-15 minutes or until readings are stable.
 - e. Record zero air point on all audit forms.
3. Start with the span/high point for NO_x. This will not be used for the NO₂ audit, but is helpful to know if there are any issues prior to the audit and also allows for higher points of other gases to be generated for the other analyzers' audits (Only one gas has to be set, the analyzer will dilute based on the gas set and the other gas points can be calculated based on the dilution).
 - b. EXAMPLE: if the range of the NO_x analyzer is 200.0 ppb.
 - i. Set NO to 200.0 ppb
 - ii. This point can be discretionary based on the points needed for the other analyzers to be audited.
 - c. Enter the desired gas amount following these steps:
 - i. **→GEN→AUTO→press gas key until NO (or desired gas)**
 1. Enter concentration for gas selected
 - ii. **→ENTER→FLOW RATE**
 1. See above 7.2.1 step 6 for determining the proper flow rate for the system
 - iii. **→ENTER**
 - d. Record the DIL, GAS and DAS values for all gases.
 - i. The DIL and GAS values will be used to calculate the actual amount for each gas that was generated, based off of the starting concentration of the gas cylinder.
 - ii. The DAS values will be compared to the actual amount for each gas.
4. Repeat step 2 above after running the NO_x span/high point.
5. Perform at least three (3) non-zero audit points and try to hit the requirements for each analyzer. This may require more than three (3) audit points.
 - b. One (1) point must be within 2-3 times of the method detection limit of the instruments within the PQAQO network (Note: This will be limited by the starting gas concentration and the limitations of the MFCs within the calibrator).
 - c. The second point will be less than or equal to the 99th percentile of the data at the site or network of sites in the PQAQO or the next highest audit concentration level.
 - d. The third point can be around the primary NAAQS or the highest 3-year concentration at the site or network of sites in the PQAQO.
6. To perform the NO₂ audit, GTPZ and GPT points will be run. Additional gases can be audited simultaneously to the GPTZ points.
 - b. Run the first GPTZ (Gas Phase Titration Zero) point
 - i. **→GEN→AUTO→GPTZ**
 1. Enter the desired NO concentration (ie. 120 ppb)
 2. Enter the desired O₃ concentration (ie. 60 ppb)
 3. Enter the desired flow rate (ie. 7.000 LPM)
 - ii. This will generate a GPTZ point, which runs like a GPT point without generating ozone.
 - iii. Wait for all gases to stabilize (~10-15 minutes) and record the DIL, GAS, O₃FLOW,

and DAS values for all gases you wish to audit (i.e., You can record SO₂, CO, CH₄, NMHC and THC values at this point). At a minimum you will need to record the NO, NO₂, and NO_x values.

- c. Run the first GPT (Gas Phase Titration) point
 - i. **→GEN→AUTO→GPT**
 1. These values will be the same as the GPTZ point previously run
 2. Enter the desired NO concentration (ie. 120 ppb)
 3. Enter the desired O₃ concentration (ie. 60 ppb)
 4. Enter the desired flow rate (ie. 7.000 LPM)
 - ii. Wait for all gases to stabilize (~10-15 minutes) and record the DIL, GAS, O₃FLOW, O₃DRIVE and DAS values for NO, NO₂, and NO_x.
 - iii. The audit spreadsheet will perform all calculations.
 - d. Repeat the above steps a and b for additional NO, NO₂ and NO_x points (ie. 50 ppb NO/20 ppb O₃ and 10 ppb NO/3 ppb O₃).
7. If other gas analyzers need additional points, follow step 3 above.

7.2.3 O₃ Analyzer Audit

The Ozone analyzer must be audited separately because O₃ gas is not stable enough to be stored in gas cylinders and must be generated at the time of the audit. The dilution calibrator will generate a known amount of ozone, which is known from the internal photometer and that gas is transferred to the site ozone analyzer. Since no additional gas is needed, the ozone generator and photometer within the dilution calibrator can be run simultaneously.

1. See Section 7.2.2, Step 2 for the zero point.
2. Prior to running O₃ audit points, it is a good idea to run the back pressure compensation.
 - a. **→SETUP→MORE→DIAG→BACK PRESSURE COMPENSATION→ENTER**
3. Begin with an ozone zero point.
 - a. This is done by generating 0.0 ppb ozone.
 - i. **→GEN→AUTO→press gas key until O₃**
 1. Enter 0.0 ppb O₃
 2. Enter Flow Rate (ie. 7.000 LPM)
 - ii. Let the point stabilize for ~10-15 minutes and then record the dilution calibrator value and the DAS value. The calibrator value will be corrected using the slope and intercept from the level 3 transfer standard ozone verification/reverification.
4. Next start with running the highest ozone audit point. This will in a way condition the system and provide the best results for the lower ozone audit points. To determine the audit points, use the following guidance:
 - a. One (1) point must be within 2-3 times of the method detection limit of the instruments within the PQA network (Note: This will be limited by the starting gas concentration and the limitations of the MFCs within the calibrator).
 - i. For the Teledyne 400E analyzers, the lower detectable limit is 0.6 ppb. Three times this would be 1.8 ppb. The Teledyne 700EU dilution calibrator has difficulty with accuracy generating ozone below 3 ppb. This point will be set around 15.0 ppb or 0.015 ppm.
 - b. The second point will be less than or equal to the 99th percentile of the data at the site or network of sites in the PQA or the next highest audit concentration level.
 - i. Historic data shows ozone values for the 1 hour max and 8 hour max.
 1. EXAMPLE: The greatest 8 hour max from the last ten (10) years was 0.123 ppm at the Boulder site. The greatest 1 hour max from the last ten (10) years was 0.165 ppm at the Boulder site. The point chosen for this

- level could be 0.125 ppm.
- ii. If the auditor chooses, this point can vary for sites depending on historical data.
 - c. The third point can be around the primary NAAQS or the highest 3-year concentration at the site or network of sites in the PQAO.
 - i. This point will be around 0.075 ppm for all sites. The NAAQS is 0.070 ppm, however that is on the edge of an audit level. To ensure the point is always within the same audit level, the point run will be 0.075 ppm.
5. To set the ozone points on the dilution calibrator follow these steps:
- a. **→GEN→AUTO→ZERO→press key until O3**
 - i. Enter concentration for ozone
 - b. **→ENTER→FLOW RATE**
 - i. See above 7.2.1 step 6 for determining the proper flow rate for the system
 - c. **→ENTER**
 - i. The system should now be out of standby mode
 - d. Let point stabilize for ~10-15 minutes and record required information on the Ozone Audit Form.

7.2.4 NO/NO_y Analyzer Audit

The NO/NO_y analyzer uses a different sample line than the NO/NO_x analyzer. Thus the same procedure to audit will need to be performed. The NO/NO_y procedure is the same as section 7.2.2. The NO_x audit form can be modified for NO_y analyzers, the calculation are all the same.

8.0 References

1. Code of Federal Regulations Title 40 Part 58 Appendix A. <https://www.ecfr.gov/current/title-40/part-58/appendix-Appendix A to Part 58>
2. QA Handbook for Air Pollution Measurement Systems: Volume II: Ambient Air Quality Monitoring Program, January 2017. https://www.epa.gov/sites/default/files/2020-10/documents/final_handbook_document_1_17.pdf
3. Teledyne Instruments Technical Manual for Model 700/700U Dynamic Dilution Calibrator. <https://www.teledyne-api.com/en-us/Products /Documents/Manual/083730700D%20-%20MANUAL,%20USER,%20NVS,%20T700,%20T700U.pdf>
4. Teledyne Instruments Technical Manual for Model 400E Photometric Ozone Analyzer. <https://www.teledyne-api.com/en-us/Products /Documents/Manual/T400%20MANUAL,%20USER,%20NVS,%20T400%20083730400B.pdf>
5. Transfer Standards for Calibration of Air Monitoring Analyzers for Ozone, Technical Assistance Document (January 2023). https://www.epa.gov/system/files/documents/2023-11/o3_tad_508_20230906_final.pdf
6. Reference Method for the Determination of Nitrogen Dioxide in the Atmosphere (Chemiluminescence). EPA Quality Assurance Document 2.3 (2002). <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-50/appendix-Appendix%20F%20to%20Part%2050>

APPENDIX A.2

MFC Verification and Calibration Form

MFC Calibration																
Date																
8/13/2021		MFC 1 Air - 220L SN 133658					MFC 2 Gas - 220L SN 132705					MFC 3 Gas - 220L SN 132705				
Drive	Current	Bios	% Difference	Changed Value	Drive	Current	Bios	% Difference	Changed Value	Drive	Current	Bios	% Difference	Changed Value		
250					250					250						
500					500					500						
750					750					750						
1000					1000					1000						
1250					1250					1250						
1500					1500					1500						
1750					1750					1750						
2000					2000					2000						
2250					2250					2250						
2500					2500					2500						
2750					2750					2750						
3000					3000					3000						
3250					3250					3250						
3500					3500					3500						
3750					3750					3750						
4000					4000					4000						
4250					4250					4250						
4500					4500					4500						
4750					4750					4750						
5000					5000					5000						

MFC 1

MFC 2

MFC 3

Acceptance Testing Form for Level 3 Transfer Standard

Ozone Transfer Standard Acceptance Testing Form					
Operator					
Organization					
Instrument Make		Teledyne			
Instrument Model		T700			
Instrument SN					
Date Preventive Maintenance Performed					
Transfer Standard Role		Level 3 Field			
Parameters	Prior to Transport	As Found	As Left	Manufacturer Specifications	Displayed As
Date					
Time					
Lab Temperature					
Lab Standard Pressure					
Cal Pressure				25-35 PSIG	CAL PRESSURE
Dilution Pressure				25-35 PSIG	DIL PRESSURE
Regulator Pressure				20 ± 1.0 PSIG	REG PRESSURE
Photo Slope				1 ± 0.03	PHOTO SLOPE
Photo Offset				0 ± 3 ppb	PHOTO OFFSET
Sample Pressure				24-30 In-Hg-A	PHOTO SPRESS
Sample Temperature				28-45 °C	PHOTO STEMP
Photometer Measure				4400-4600 mV	PHOTOMEAS
Photometer Reference				4400-4600 mV	PHOTOREF
Photometer Flow				0.720-0.880 LPM	PHOTO FLOW
Photometer Lamp Temp				58 ± 0.5 °C	PHOTO LAMP TEMP
Dark Offset				0 ± 20 mV	DARK OFFSET
Box Temp				8-48 °C	BOX TEMP
O3 Gen Ref				25-600 mV	O3GENREF
O3 Flow				0.100-0.200 LPM	O3GENFLOW
O3 Gen Drive				800 mV	O3GENDRIVE
O3 Lamp Temp				48 ± 0.5 °C	O3GENTEMP
Comments					
Acceptance Testing is required after a new transfer standard is received from the manufacturer, prior to verification or reverification of a transfer standard, when a transfer standard is shipped, or when a device requires repair. Should follow preventive maintenance.					

Example Ozone Verification Form (see EPA's Ozone Verification Spreadsheet)

O3 Transfer Standard Verification Data Form

Institute Conducting Verification: WDEQ-AQD Operator: Shelby Watkins Cycle 3 Date: 9/10/2021 Naming Convention: WDEQ Ozone Verification Transfer Standard of Higher Authority Transfer Standard Role: Level 2 Bench Make: Teledyne Model: T400 Serial Number: 3121 Verification Date: 4/26/2021 Calibration Factors Span Setting: 1.006 Zero Setting: 0.5 Candidate Transfer Standard Information Candidate Transfer Standard Role: Level 3 Field Make: Teledyne Model: T700U Serial Number: 173 Preventive Maintenance Date: 8/13/2021 Acceptance Testing Date: 8/25/2021 Calibration Factors (describe calibration factor changes in comments) Span Setting: Zero Setting As Found: 0.995 0.2 As Left: 0.995 0.2 Comments:	Acceptance Criteria Checklist Verification Results: pass Transfer Standard Role check: pass Preventive Maintenance Completed: pass Acceptance Testing Completed: pass Per Point Difference: pass Regression Slope Check: pass Regression Intercept Check: pass Std Deviation Slope: pass Std Deviation Intercept: pass Signature: _____ Date: _____
---	---

Cycle 1 Verification Data

	Cycle 1 Date: 9/10/2021		
	Regression Slope: 0.9898		
	Regression Intercept: -0.32		
	Higher Level Standard	Candidate Transfer Standard	
	Teledyne 1400 SN 3121	Teledyne T700U SN 173	
Zero:	0.0	0.0	NA 0.1
Point 1:	202.1	200.0	-1.1% -2.2
Point 2:	161.7	159.8	-1.2% -2.0
Point 3:	121.6	120.2	-1.2% -1.5
Point 4:	90.8	90.0	-0.9% -0.9
Point 5:	61.2	60.0	-1.8% -1.1
Point 6:	30.8	30.1	-2.3% -0.7
Point 7:			0.0% 0.0
Point 8:			0.0% 0.0
Point 9:			0.0% 0.0
Point 10:			0.0% 0.0
Zero:	0.4	-0.3	NA -0.6

Cycle 2 Verification Data

	Cycle 2 Date: 9/10/2021		
	Regression Slope: 0.9890		
	Regression Intercept: -0.48		
	Higher Level Standard	Candidate Transfer Standard	
	Teledyne 1400 SN 3121	Teledyne T700U SN 173	
Zero:	-0.1	-0.4	NA -0.3
Point 1:	202.1	199.6	-1.2% -2.5
Point 2:	162.2	160.0	-1.4% -2.2
Point 3:	121.7	120.3	-1.1% -1.3
Point 4:	91.8	90.1	-1.9% -1.7
Point 5:	61.1	59.8	-2.2% -1.3
Point 6:	30.7	30.3	-1.3% -0.4
Point 7:			0.0% 0.0
Point 8:			0.0% 0.0
Point 9:			0.0% 0.0
Point 10:			0.0% 0.0
Zero:	0.4	-0.5	NA -0.8

Cycle 3 Verification Data

	Cycle 3 Date: 9/10/2021		
	Regression Slope: 0.9907		
	Regression Intercept: -0.57		
	Higher Level Standard	Candidate Transfer Standard	
	Teledyne 1400 SN 3121	Teledyne T700U SN 173	
Zero:	0.6	-0.4	NA -1.0
Point 1:	202.3	199.8	-1.2% -2.5
Point 2:	162.8	160.1	-1.6% -2.6
Point 3:	121.8	119.8	-1.7% -2.0
Point 4:	91.2	89.8	-1.5% -1.4
Point 5:	61.3	60.0	-2.2% -1.4
Point 6:	31.0	30.2	-2.6% -0.9
Point 7:			0.0% 0.0
Point 8:			0.0% 0.0
Point 9:			0.0% 0.0
Point 10:			0.0% 0.0
Zero:	0.1	0.0	NA -0.1

WDEQ-AQD Gaseous Audit Forms

		WDEQ-AQD Audit Spreadsheet Setup																																																																			
<p>Date</p> <p>Visit Start Time</p> <p>Visit End Time</p> <p>Auditor</p> <p>Contractor Representative</p> <p><u>Coordinates</u></p> <p>Latitude</p> <p>Longitude</p>	<p>Site name</p> <p>Site Contractor</p> <p>Site Visit Reason</p> <p>DAS Model</p> <p>DAS S/N</p> <p>Analyzers Offline</p> <p>Analyzers Online</p> <p>Station Temperature (°C)</p>																																																																				
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CH₄ & NMHC ANALYZER AUDIT

ABBR.	
CLIENT	FIELD SPECIALIST
SITE NAME	DATE

	AMBIENT ANALYZER	GAS DILUTION SYSTEM	
Manufacturer	Baseline-MOCON		
Model			
Serial Number			
Methane Gain			
Non-methane Gain			
Purge time (sec)			
CH4 Dwell / Non-CH4 Dwell (min)			
Fuel Flow (ccm)			
Air Flow (ccm)			
Sample Flow (ccm)			
Fuel Pressure (psi)			
Air Pressure (psi)			

AUDIT GAS		ppmC	
Cylinder S/N		CH ₄ Conc.	0.0
Expiration Date		Non-CH ₄ Conc.	0.0
Cylinder Pressure		CH ₄ Span	
Delivery Pressure		Non-CH ₄ Span	
CH ₄ Conc. (ppm)			
C ₂ H ₆ Conc. (ppm)			

AUDIT CRITERIA (<=)	
Percent Difference of each audit level (%)	15%

	CH ₄	NMHC	THC
Full Scale (ppmC)			

LEVEL	TARGET	GAS DILUTION SYSTEM					METHANE (ppmC)					NON-METHANE (ppmC)					THC (ppmC)				
		CH ₄	C ₃ H ₈	THC	Z-air Flow	Gas Flow	DAS	Diff	%Diff	%LIN	P/F	DAS	DIFF	%DIFF	%LIN	P/F	DAS	Diff	%Diff	%LIN	P/F
ZERO	0								N/A		N/A			N/A		N/A			N/A		N/A
HIGH	0.00																				
MID	0.00																				
LOW	0.00																				
							Slope					Slope					Slope				
							Y-Intercept					Y-Intercept					Y-Intercept				
							Correlation					Correlation					Correlation				

NOTES:



BTEX ANALYZER AUDIT

ABBR.			
CLIENT		FIELD SPECIALIST	DATE
SITE NAME			

MANUFACTURER	
MODEL	
SERIAL NUMBER	

AUDIT GAS #1		AUDIT GAS #2	
Cylinder S/N		Cylinder S/N	
Expiration Date		Expiration Date	
Benzene (ppb)		Benzene (ppb)	
Toluene (ppb)		Toluene (ppb)	
Ethylbenzene (ppb)		Ethylbenzene (ppb)	
o-Xylene		o-Xylene	
m-Xylene		m-Xylene	
p-Xylene		p-Xylene	
Total Xylenes		Total Xylenes	

Compound	Target Value ppb	ANALYZER		
		Response	Difference	% Difference
Benzene				
Toluene				
Ethylbenzene				
Total Xylenes				

Compound	Target Value ppb	ANALYZER		
		Response	Difference	% Difference
Benzene				
Toluene				
Ethylbenzene				
Total Xylenes				

NOTES:

APPENDIX B: Ancillary Information

**Wyoming Department of
Environmental Quality – Air
Quality Division**



WYOMING DEPARTMENT OF
ENVIRONMENTAL
QUALITY

**Appendix B – Ancillary Information
For Total Hydrocarbons Monitoring**

**November 2025
Revision 4**

1.0 Instrument Locations

Table 1 is based on the current WDEQ-AQD Ambient Air Monitoring Stations and Operations. For Historic locations, see Figure 1 in the QAPP.

Table 1. Monitoring Station Details

Station Name	AQS ID	Latitude	Longitude	AQD Project Manager	Contractor	Site Operator
Boulder	56-035-0099	42.719	-109.753	Project Manager	Ambient Air Consultants	AQD/Contractor
Cheyenne NCore	56-021-0100	41.1825	-104.77842	Project Manager	Ambient Air Consultants	AQD/Contractor
Converse County	56-009-0100	43.10108	-105.49896	Project Manager	Ambient Air Consultants	AQD/Contractor
Juel Spring	56-035-1002	42.37350	-109.56050	Project Manager	Ambient Air Consultants	AQD/Contractor
Lysite Mobile	56-013-0005	43.27421	-107.69177	Project Manager	Ambient Air Consultants	AQD/Contractor
Moxa Arch	56-037-0300	41.75056	-109.78833	Project Manager	Ambient Air Consultants	AQD/Contractor
Rawlins Mobile	56-007-0011	41.80547	-107.22719	Project Manager	Ambient Air Consultants	AQD/Contractor
Wamsutter	56-037-0200	41.67771	-108.02415	Project Manager	Ambient Air Consultants	AQD/Contractor
Wright Mobile	56-005-0019	43.75158	-105.49308	Project Manager	Ambient Air Consultants	AQD/Contractor

2.0 Type of Instruments

The Baseline-Mocon Methane/HC 9000 series analyzer provides accurate and reliable total hydrocarbon analysis. The 9000 has a range of less than 10 ppb on the low range and up to 100% methane on the high range. The analyzer is based on flame ionization detector (FID) with FlowGuard electronic control that delivers a small portion of the sample gas to the detector flame. During the combustion process, organic or hydrocarbon-based gases in the sample are ionized then they are detected by the instrument and reported as a concentration. See Table 2, below, for specific information on each instrument.

Table 2. Site-Specific Total Hydrocarbon Analyzer Details

Station Name	Instrument Make/Model	Serial Number	Audit Frequency	Method Code
Boulder	Baseline-MOCON Series 9000NMHC	1023DR0882	Quarterly	011
Cheyenne NCore	Teledyne N901	TBD	Quarterly	TBD
Converse County	Baseline-MOCON Series 9000NMHC	1214DR0248	Semi-Annual	011
Juel Spring	Baseline-MOCON Series 9000NMHC	1219DR0581	Semi-Annual	011
Lysite Mobile	Baseline-MOCON Series 9000NMHC	0624DR0915	Semi-Annual	011
Moxa Arch	Baseline-MOCON Series 9000NMHC	1219DR0580	Semi-Annual	011
Rawlins Mobile	Baseline-MOCON Series 9000NMHC	0624DR0914	Semi-Annual	011
Wamsutter	Baseline-MOCON Series 9000NMHC	1210DR0041	Semi-Annual	011
	Teledyne N901	TBD	Semi-Annual	TBD
Wright Mobile	Baseline-MOCON Series 9000NMHC	0624DR0915	Semi-Annual	011

3.0 AQS Coding

AQS numbers are assigned for each monitoring station and parameters. Table 3 illustrates the AQS code used for the WDEQ-AQD program. A sample of the AQS raw data is presented below. Please note all data submitted to AQS is pipe-delimited.

```
RD|I|56|021|0100|43101|1|1|101|087|20181001|00:00|5.0|
RD|I|56|021|0100|43101|1|1|101|087|20181001|00:00|5.0|
RD|I|56|021|0100|43101|1|1|101|087|20181001|00:00|8.0|
RD|I|56|021|0100|43101|1|1|101|087|20181001|00:00|9.0|
RD|I|56|021|0100|43101|1|1|101|087|20181001|00:00|3.0|
RD|I|56|021|0100|43101|1|1|101|087|20181001|00:00|9.0|
RD|I|56|021|0100|43101|1|1|101|087|20181001|00:00|0.0|
```

The column order is defined as follows in Table 3:

Table 3. Example Transaction Codes for AQS

Fields	Example
Transaction Type	RD (Raw Data Type)
Action Indicator	I (Insert)
State Code	56 (Wyoming)
County Code	021 (Laramie County)
Site ID	0100 (Cheyenne NCore)
Parameter Code	43101 (Total Hydrocarbons)
POC	1
Duration Code	1 (Hourly)
Reported Unit Code	101 (parts per million-Carbon)
Method Code	*See Table 2
Date	YYYYMMDD
Sample Time	HH:MM (hour- beginning)
Reported Sample Value	5.0
Null Data Code	AN
Monitor Protocol ID	(N/A)
Qualifier Code	Up to ten (10) permitted

APPENDIX C: Revision Summary

