



pramp

PEACE RIVER AREA MONITORING PROGRAM

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March 6, 2019

Alberta Environment and Parks (AEP)
Monitoring Branch
Environmental Monitoring and Science Division
Main Floor Bldg 3 McIntyre Center
4946 – 89 street
Edmonton, AB, T6E 5K1

Mr. Beaton:

RE: Ambient Air Monitoring Station Audit Results for the PRAMP Network
Your File(s): 2018-400A/408A

Below, please see the responses and corrective actions either completed or proposed in response to Alberta Environment and Park's audit of the Peace River Area Monitoring Program ambient air monitoring network.

COMMON ISSUE: Wind speed and direction sensor siting does not meet AMD criteria

Reno Station / 1 *"Based on observations and measurements made at the Reno station it appears that the wind speed and direction sensor siting does not meet AMD criteria found in Chapter 3 SS 2-G and Table 3/Figure 2. The wind sensor siting non-conformance was documented in the updated station site documents provided immediately following the audit. PRAMP is required to either site the wind sensor such that it meets AMD Chapter 3 siting requirements, or obtain written authorization from "The Director" to deviate from AMD siting requirements."*

Station 986 / 2 *"Based on observations and measurements made at the Reno station it appears that the wind speed and direction sensor siting does not meet AMD criteria found in Chapter 3 SS 2-G and Table 3/Figure 2. The wind sensor siting non-conformance was documented in the updated station site documents provided immediately following the audit. PRAMP is required to either site the wind sensor such that it meets AMD Chapter 3 siting requirements, or obtain written authorization from "The Director" to deviate from AMD siting requirements."*

Corrective Action: PRAMP will investigate options for bringing the wind speed and direction sensor at the Reno station into compliance with the AMD. Options currently being investigated include installing a

taller tower, removing surrounding trees, and moving the station to a new location. All of these options have implications including but not limited to safety, migratory/nesting birds, and budget limitations. Additionally, the *Oil Sands Network Optimization Project* is nearing completion and recommendations from that process may inform a path forward with respect to long-term monitoring at the Reno site. PRAMP will provide a status report regarding the outcome of its investigation into the above options by June 28th, 2019.

Unrelated to the audit results, PRAMP is preparing to move Station 986 to a new site less than 1km away from its current location; it is intended to be representative of the existing monitoring location and the area of the airshed it currently serves. The new site meets AMD siting criteria for wind sensors as it is unimpeded by trees on 3 of 4 sides. PRAMP is in the process of preparing the new site for the station including developing a site access agreement with the landowner, preparing a level pad, and installing electrical connections. PRAMP anticipates the station will be relocated in April 2019.

ISSUE: PRAMP must provide a timeline to finalize and implement a QAP.

PRAMP Program / 3 *“Upon receiving notification of this performance audit PRAMP was asked to provide the date of the most recent quality system audit as required by AMD Chapter 5 QS 4-A and QS 4-B(b). PRAMP indicated that the network QAP is currently in draft form. Additionally, PRAMP relies on Maxxam Analytics QAP which last underwent an internal audit March 30, 2018.”*

Corrective Action: PRAMP has been developing an internal QAP over the last two years. As part of 2019-20 workplans submitted to Alberta Environment – Environmental Monitoring and Science Division (EMSD) in January 2019, PRAMP budgeted for an external audit of the PRAMP QAP. The draft QAP is nearly complete and PRAMP expects the external audit to be completed in first quarter of the new fiscal year (April – June 2019), pending EMSD workplan and budget approval.

Should you have any questions regarding the steps taken to address the audit finding, please don't hesitate to contact me.

Respectfully,



Karla Reesor
Executive Director

CC: Marty Collins (AEP)
Al Clark (AEP)
Bob Myrick (AEP)