Report from the Performance Audit of the

Mexico City Ambient Air Monitoring Network

Gobierno del Distrito Federal (GDF) Secretaría del Medio Ambiente



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By

The United States Environmental Protection Agency (USEPA) Office of Air Quality Planning and Standards (OAQPS) Pacific Southwest Regional Office (Region 9) Report from the Performance Audit of the

Mexico City Ambient Air Monitoring Network

Gobierno del Distrito Federal (GDF) Secretaría del Medio Ambiente

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I. <u>Executive Summary</u>

The United States Environmental Protection Agency (USEPA) was requested by the Environmental Secretariat of the Government of the Federal District (*Secretaria del Medio Ambiente del Gobierno del Distrito Federal* (GDF)) and the Pan American Health Organization (PAHO) to conduct performance audits of the Mexico City ambient air monitoring network. Audits had previously been performed in Mexico City by the USEPA Office of Research and Development (ORD). The USEPA Office of Air Quality Planning and Standards (OAQPS) agreed to conduct audits in calendar year (CY) 2003 and enlisted the assistance of USEPA Region 9.

The USEPA Office of Research and Development (ORD) conducted the last performance audit, which also highlighted system findings, in October 2000. Since this audit there have been improvements to GDF's air monitoring quality system especially in the area of documentation and regular application of Quality Control (QC) procedures. These include improvements in network design, the use of standard operating procedures (SOPs), logbooks, routine calibration, and zero/span schedules. There have been Quality Assurance (QA) staff identified and there is a desire by management to have a QA system equivalent to USEPA and meeting The International Organization for Standardization *Quality Management System Standard* (ISO9000) requirements.

This report details performance audits conducted using the USEPA National Performance Audit Program (NPAP) audit system. The NPAP utilizes transportable audit equipment that is designed to deliver test concentrations that are unknown directly into the air monitoring equipment being audited. Nine monitoring stations and the reference air monitors located at the GDF laboratory were audited by USEPA staff. Four of these stations were re-audited by the GDF using the NPAP device. The GDF also performed additional audits at six monitoring stations for a total of fifteen monitoring stations and laboratory monitors audited.

Based on a systematic assessment of all the individual monitors audited, the monitoring system is accurate and well-implemented. The Ozone audit data were of outstanding quality with no significant bias or imprecision detected across all stations and concentrations audited. The Ozone audit results also reflected a significant quality improvement. Nitric Oxide was monitored as a surrogate for Nitrogen Dioxide. Nitric Oxide data quality has also improved. Nitric Oxide and Carbon Monoxide audit data were of acceptable quality. However, for these two pollutants the GDF should evaluate the potential for measurement quality improvement at low concentrations. Most Sulfur Dioxide audits were of acceptable quality. Overall evaluation of the Sulfur Dioxide data indicated that there is potential for high bias and imprecision at low concentrations. The overall high bias observed, in the Sulfur Dioxide concentrations in the air basin. The NPAP audits provide a more rigorous approach than has been applied to the GDF in the past. First, the audits were

conducted using a lower audit concentration. Second, each audit average percent difference was determined using three audit concentrations including the lower audit concentrations and excluding the blank. Third, the audit concentrations were not known by the auditor at the time of the audit. Fourth, a more rigorous statistical analysis was applied. The ultimate result of these performance audits indicates that the GDF monitoring system is functioning well. Additionally, as is the intent of most audits, areas where data quality can be improved have been identified.

USEPA recommends that the GDF:

1. Review its network design with the potential for reducing the number of stations monitoring pollutants not exceeding regulatory standards and increasing and/or moving Ozone monitoring in response to urban growth.

2. Institute an internal performance audit system and system audit.

3. Review monitoring stations' compliance with siting criteria and, where necessary, increase probe heights or trim back trees.

USEPA would like to thank the GDF for its cooperation, innovation, and forward thinking¹.

¹ Forward thinking programs are proactive, progressive programs which are often of better quality than reactive, conservative programs. This is because they look for potential problems before they occur and take preventive action, rather than waiting for them to happen and then reacting, which is more expensive and usually much less effective.

II. Introduction

The USEPA provided performance and system audit support to the GDF in the months of November and December of 2003. This report details the results of these audits and recommendations from the USEPA to the GDF.

The air monitoring performance audit support provided by USEPA to the GDF is the same type of support provided by USEPA to State, Local, and Tribal monitoring networks in the United States. The monitoring results for individual air monitors have been evaluated and scored in exactly the same manner as done for monitoring networks overseen by USEPA. Some additional analysis of the pooled data has been conducted by USEPA to assist the GDF in identifying areas for improvement and data quality trends. System audit comments are provided in Section V and Appendix A of this report. These are not part of a formal system audit and should not be considered comprehensive. All the findings presented are intended to assist the GDF in identifying areas for quality improvement (recognizing that all organizations can and should identify areas for improvement).

The authors of this report are committed to providing technical feedback, upon reasonable request, to assist the GDF in making improvements to the Atmospheric Monitoring System (*Sistema de Monitoreo Atmosférico* (SIMAT)).

III. Background

This section provides background on the organizations and procedures used during this audit. The reader who is familiar with these may want to skip to Subsection E (page 15) which summarizes previous audits of the GDF.

A. Secretaría del Medio Ambiente del Gobierno del Distrito Federal (GDF)

The Secretariat of the Environment of the Federal District Government (*Secretaría del Medio Ambiente del Gobierno del Distrito Federal*) is responsible for environmental policies and programs, including implementing local and federal laws, in the Federal District. The GDF became the primary organization responsible for ambient air monitoring in the Mexico City area in 1993 when the Automatic Ambient Air Monitoring Network (*La Red Automática de Monitoreo Atmosférico* (RAMA)) was transferred to the GDF.

Prior to the early 1970's, air quality monitoring in Mexico City was part of the Normalized Pan American Sampling Network (*Red Panamerican de Muestreo Normalizado*). In 1971, Mexico passed the Law for Preventing and Controlling Environmental Contamination, (*Ley para Prevenir y Controlar la Contaminatión Ambiental*). In 1972 the Subsecretary for Environmental Improvement (*Subsecretaría de Mejoramiento del Ambiente*) was created under the Secretary of Health. These events led to the creation of a 48 station National monitoring network, with 22 of these stations being in the Mexico City air basin.

Currently the Mexico City Atmospheric Monitoring System (*Sistema de Monitoreo Atmosférico* (SIMAT)) consists of 54 monitoring stations, a support laboratory, an environmental information center, and an information technology support center. Monitoring is further segregated into an Automatic Ambient Air Monitoring Network (*La Red Automática de Monitoreo Atmosférico* (RAMA)) (see Figure 1 and Table 1), a Manual Particulate Monitoring Network, an Atmospheric Deposition Network, and a Meteorological Network. With the support of the environmental information center and the information technology support center, monitoring data are translated daily and hourly into the Metropolitan Area Air Quality Index (*Indice Metropolitano de la Calidad del Aire* (IMECA)). The IMECA is widely distributed to public and private sector organizations in the Mexico City area to assist in making public heath decisions.

B. Secretariat of the Environment and Natural Resources (SEMARNAT)

The Secretariat of the Environment and Natural Resources (*Secretaria de Medio Ambiente y Recursos Naturales* (SEMARNAT)) is the primary federal agency responsible for environmental protection in the Country of Mexico. The Subsecratary of Environmental Protection Management (*Subsecretaria de Gestión para la Protección Ambiental*) is the SEMARNAT organizational unit primarily responsible for environmental quality. However, the National Institute of Ecology (*Instituto Nacional de Ecología* (INE)) provides technical and research support for environmental issues (including monitoring).

C. <u>US Environmental Protection Agency (USEPA)</u>

The USEPA has been given the role of "protecting human health and the environment" in the United States and its territories and possessions. The USEPA's authority to regulate ambient air emissions is derived from the US Clean Air Act (CAA). USEPA's responsibility, under the Clean Air Act (CAA) as amended in 1990, includes: setting National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to the public health and environment; ensuring that these air quality standards are met or attained (in cooperation with States) through national standards and strategies to control air emissions from sources; and ensuring that sources of toxic air pollutants are well controlled.

1. Office of Air Quality Planning and Standards (OAQPS)

EPA's air programs are managed by the Office of Air and Radiation (OAR) of which OAQPS is a part. The Role of OAQPS as defined by

the Quality Assurance Handbook for Air Pollution Measurement Systems (Redbook), 1998, is:

OAQPS is the organization charged under the authority of the CAA [US Clean Air Act] to protect and enhance the quality of the nation's air resources. OAQPS sets standards for pollutants considered harmful to public health or welfare and, in cooperation with EPA's Regional Offices and the States, enforces compliance with the standards through state implementation plans (SIPs) and regulations controlling emissions from stationary sources. OAQPS evaluates the need to regulate potential air pollutants and develops national standards; works with State and local agencies to develop plans for meeting these standards; monitors national air quality trends and maintains a database of information on air pollution and controls; provides technical guidance and training on air pollution control strategies; and monitors compliance with air pollution standards.

The specific monitoring responsibilities of OAQPS are to:

- ?? ensure that the methods and procedures used in making air pollution measurements are adequate to meet the programs objectives and that the resulting data are of satisfactory quality
- ?? operate the National Performance Audit Program (NPAP)
- ?? evaluate the performance of organizations making air pollution measurements of importance to the regulatory process
- ?? implement satisfactory quality assurance programs over EPA's Ambient Air Quality Monitoring Network
- ?? ensure that guidance pertaining to the quality assurance aspects of the Ambient Air Program are written and revised as necessary
- ?? render technical assistance to the EPA Regional Offices and air pollution monitoring community

2. Pacific Southwest Regional Office (Region 9)

The USEPA Regions are responsible for implementing USEPA's environmental programs in the States, Territories, and positions under their respective jurisdictions.

USEPA Region 9 has responsibility for the States of California, Hawaii, Nevada, and Arizona (also parts of Utah and New Mexico under the jurisdiction of the Navajo Nation). Region 9 is also responsible for Guam, the Pacific Trust Territories, and US possessions in the Pacific Ocean (e.g. Midway Island). Under the North American Free Trade Agreement Treaty (NAFTA) Region 9 shares responsibility with Region 6 for the US/Mexico border area. As such, Region 9 seeks cooperation, where appropriate, with environmental agencies in the country of Mexico.

Under the ambient air monitoring program, the EPA Regions are directly responsible to ensure State, Local, and Tribal monitoring networks are properly designed and operated. The Regions perform this task by providing training, technical assistance, interpretation of regulations, technical reviews, performance audits, technical system audits, and other support and oversight as required.

3. Office of Research and Development (ORD)

The USEPA ORD is responsible for providing research and scientific support to USEPA's programs. The National Exposure Research Laboratory (NERL) is the ORD program that supports USEPA's ambient air monitoring program. The *Redbook* notes:

The mission of NERL is to develop scientific information and assessment tools to improve the Agency's exposure/risk assessments, identify sources of environmental stressors, understand the transfer and transformation of environmental stressors, and develop multimedia exposure models. The NERL provides the following activities:

- ?? develops, improves, and validates methods and instruments for measuring gaseous, semi-volatile, and non-volatile pollutants in source emissions and in ambient air
- ?? supports multi-media approaches to assessing human exposure to toxic contaminated media through development and evaluation of analytical methods and reference materials, and provides analytical and method support for special monitoring projects for trace elements and other inorganic and organic constituents and pollutants
- ?? develops standards and systems needed for assuring and controlling data quality
- ?? assesses whether emerging methods for monitoring criteria pollutants are "equivalent" to accepted Federal Reference Methods and are capable of addressing the Agency's research and regulatory objectives
- ?? provides an independent audit and review function on data collected by NERL or other appropriate clients

D. USEPA Ambient Air Monitoring Program Audits

1. <u>USEPA Performance Audits and the National Performance Audit</u> <u>Program (NPAP)</u>

Performance audits are intended to independently evaluate the performance of the audited agency's training, site operators, monitoring equipment, calibration equipment, standards, and all operating, calibration, maintenance, quality assurance, quality control, and data processing procedures, including calculation, transfer, and reporting. The most rigorous performance audits would involve independent audit equipment, an independent auditor, and unknown audit concentrations being delivered in a representative air matrix through the inlet of the probe. Such a system does not yet exist. USEPA uses a system which incorporates many of these concepts to produce robust audit data. On a routine basis, monitoring organizations perform audits using an internal, yet independent, auditor(s) and independent equipment. Gaseous pollutant audits may be accomplished by either adding challenge gases directly to the instruments or through the inlet of the sampling probe, the preferred method. To supplement these audits USEPA uses a mail-out system called the National Performance Audit Program (NPAP). The NPAP utilizes transportable audit equipment that is designed to deliver audit concentrations that are "blind" (unknown) through the back of the instruments audited. It is advantageous for the monitoring agency to use independent auditors to perform these audits. More recently USEPA has developed a "through the probe" (TTP) audit program. This program utilizes independent (USEPA staff or contractors) auditors using a vehicle equipped to perform audits through the sampling probe. This TTP system has the advantage, over the initial NPAP, of testing the whole sampling system using independent staff and giving real time results. Unlike NPAP, the concentration of audit gas used in the TTP system is not blind to the auditor, but is still blind to the station operator.

The mailed NPAP audits are conducted using auditing equipment that has been demonstrated reliable, when transported by commercial freight shipping, and verifiable. The audit devices are shipped in rugged cases containing rigid molded vibration insulation. The cases include a continuous zero air generation system (which includes a pump and three different scrubbing cartridges), a US National Institute of Standards and Technology (NIST) traceable gas standard cylinder, and/or an Ozone generator, and an adjustable mixing and dilution system. The equipment is certified and sent to the auditing agency by a USEPA support contractor. Independence is preserved, even for the audit equipment operator. The support contractor provides auditspecific instructions with the devices that tell the audit operator what settings to use for each audit test point, but not what concentrations the settings will generate, and not how to calculate the concentrations with the data that the auditor or station operator has. The devices are NISTtraceably certified by the audit support contractor to audit at three concentrations as well as to evaluate the instrument's zero.

The results of the NPAP audit are assessed by USEPA's NPAP support contractor. This assessment includes verification that the audit devices are functioning properly both before their initial shipment to the audited agency and upon return. The audited agency's data are evaluated based on percent difference from the audit concentrations. The acceptance criterion for gaseous pollutants is 15% mean absolute difference and 15% for each concentration of each pollutant at each monitoring site. Monitors that exceed this criterion clearly require corrective action. Monitoring agencies should also assess the need for systematic changes. Also reported are the results for individual audit concentrations, linearity, and blank evaluations. This additional information should be considered by agencies when evaluating the need for corrective action and/or for their quality improvement process.

2. <u>Technical System Audits (TSAs) and Management System</u> <u>Reviews (MSRs)</u>

Technical System Audits (TSAs) and Management System Reviews (MSRs) are reviews intended to evaluate how well the established quality system is working. These types of audits can be performed by independent internal or external auditors.

Technical System Audits, as the name implies, are technical in nature. They are used to verify that appropriate technical and quality control procedures have been established and are being followed. For air monitoring organizations, some areas which are audited include:

- ?? written procedures
- ?? documentation
- ?? monitoring network design
- ?? site appropriateness/siting requirements
- ?? instrument operation
- ?? laboratory procedures
- ?? sample/data custody
- ?? data handling systems
- ?? data processing and calculation
- ?? quality control
- ?? performance audit system

Management System Reviews are evaluations of how the QA program is working. These audits evaluate the overall quality system and do not effectively identify technical defects with the system. MSRs include the evaluation of:

- ?? organizational structure
- ?? quality policy
- ?? quality manager empowerment and effectiveness
- ?? quality documentation
- ?? corrective actions
- ?? training and qualifications of staff
- ?? commitment to quality by management and staff
- ?? overall effectiveness of the quality system

E. Previous Audits of Mexico City's Air Monitoring Program

Staff from the USEPA ORD provided periodic performance audits of the Mexico City's air monitoring network prior to 2001. The last audit was conducted in October of 2000. This audit evaluated the performance for 14 monitoring stations. Additionally system audit concepts were evaluated by USEPA ORD. The results of this audit were noted as meeting the criteria used to evaluate monitor bias. The findings of the system audit, conducted in 2000, identified significant deficiencies in the quality system, the condition of the monitoring equipment (inadequate spare parts), and the physical state of some monitoring stations.

Table 1

Mexico City's Atmospheric Monitoring System Automatic Ambient Air Monitoring Network Stations

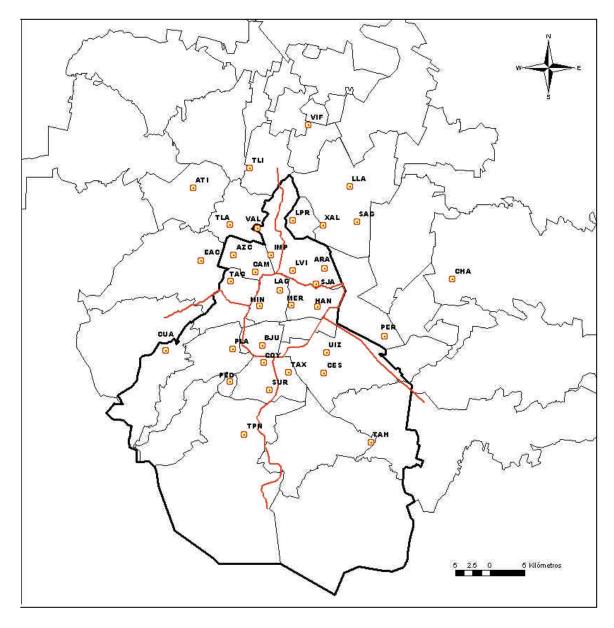
Actual Instrumentation

Zone	Station Name	Initials	O ₃	CO	SO_2	NOx	PM ₁₀	PM _{2.5}
	Vallejo	VAL						
	Tacuba	TAC						
	ENEP Acatlán	EAC						
	Azcapotzalco	AZC						
Northwest	Tlalnepantla	TLA						
	I. M. P.	IMP						
	Tultitlán	TLI						
	Atizapán	ATI						
	Cuitlahuac	CUI						
	Camarones	CAM						
	Los Laureles	LLA						
	La Presa	LPR						
	La Villa	LVI						
	San Agustín	SAG						
	Xalostoc	XAL						
Northeast	Aragón	ARA						
Northeast	Nezahualcoyotl	NET						
	Villa de las Flores	VIF						
	Chapingo	CHA						
	Perla Reforma	PER						
	San Juan de Aragón	SJA						
	Lagunilla	LAG						
	Merced	MER						
Center	Hangars	HAN						
	Benito Juárez	BJU						
	Metro Insurgentes	MIN						
	Santa Ursula	SUR						
	Pedregal	PED						
Southwest	Plateros	PLA						
	Cuajimalpa	CUA						
	Tlalpan	TPN						
	Coyoacán	COY						
	Cerro de la Estrella	CES						
Southeast	UAM Iztapalapa	UIZ						
	Taxqueña	TAX						
	Tlahuac	TAH						

Figure 1

Mexico City's Atmospheric Monitoring System Automatic Ambient Air Monitoring Network Map

Actual Coverage



Federal District Limits Adjoined Municiaplities in the State of Mexico

IV. Performance Audit Results

To evaluate the GDF's air monitoring network, USEPA utilized NPAP audit devices. Four parameters were audited, Ozone (O₃), Nitric Oxide (NO), Carbon Monoxide (CO), and Sulfur Dioxide (SO₂). NO audit results are representative of Nitrogen Dioxide (NO₂) and Oxides of Nitrogen (NO_x). Three distinct sets of performance audits were completed. From November third through the seventh of 2003, USEPA staff conducted audits at nine monitoring stations and at the GDF laboratory. In late November and early December of 2003 an independent GDF QA auditor conducted audits. Four stations audited by USEPA staff in early November were re-audited. Six additional monitoring stations were also audited by the GDF auditor. Sections IV.A and IV.B summarize the results of these audits, which are also included in Appendix C. The results are evaluated in Section IV.B. Finally, recommendations for air monitoring system improvements are given.

Each monitor was evaluated at three audit concentration, and "zero air" was generated to confirm the instruments baseline. These concentrations were used to determine the linearity of each instrument. Each individual concentration was then used to evaluate instrument performance for bias at high, medium, and low levels. At the conclusion of the tests, the mean absolute (MA) percent difference (%D) was calculated for the instrument by averaging the %D values for the three concentrations. The acceptance criterion for these individual tests was <15% MA %D.

The results presented in Appendix C give percent difference (%D) for each audit point, blank results, linearity, and MA %D, as prepared by USEPA's NPAP support contractor. The audit result summary sections that follow note individual monitor exceedances of the 15 %D criterion for mean absolute difference.

USEPA also assessed the data set to determine precision and bias for the monitoring network. This was done by calculating the mean and the standard deviation of the MA %Ds for each pollutant in each data set. This information was used to calculate the potential range of values which represent 96% of normally distributed data (two standard deviations from the mean). If this range exceeded the 15% criterion for MA %D, it is noted in the following sections. This approach is consistent with the quarterly performance audit assessment performed by monitoring networks in the United States (US). (US Code of Federal Regulations Title 40, Part 58, Appendix A, Section 5.1.2)

Additionally, the same statistics were used to evaluate each audit concentration and the blank concentrations in each data set. This information was used to evaluate where to focus corrective action for pollutants with MA %Ds above 15%, and where quality control improvements can be targeted for pollutants with MA %Ds below 15%.

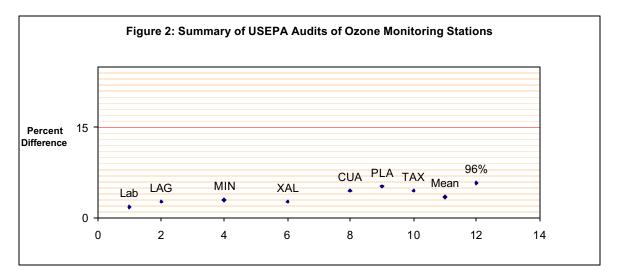
A summary of the MA %D data is also presented graphically in Figures 2 through 9. Each station audited is identified by acronym presented from Table 1.

It should be noted that the evaluation of this data set that follows is based on criteria in USEPA regulation, USEPA guidance, and the best professional judgment of the auditors. Audit criteria should be set by the GDF in a quality planning document and based on locally or nationally established tolerance for measurement error.

A. Audits conducted in November 2003 by USEPA

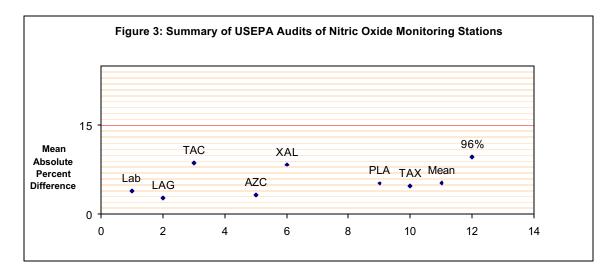
1. <u>Ozone (O₃)</u>

USEPA evaluated Ozone monitors at seven monitoring locations and the Ozone monitor at the GDF laboratory. The mean absolute %Ds ranged from 1.8 at the laboratory to 5.2 at the Plateros station. Additionally, when evaluating each audit concentration result across monitors using the 96% probability criterion, did not approach the 15 %D criterion.



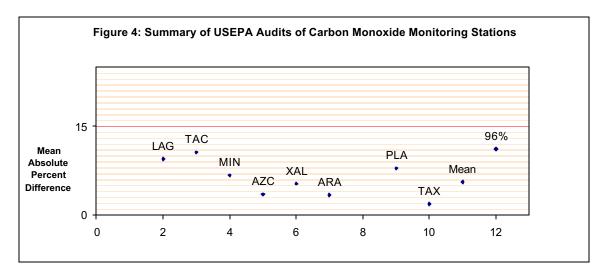
2. <u>Nitric Oxide (NO)</u>

USEPA evaluated Nitric Oxide monitors at six monitoring locations and at the GDF laboratory. The mean absolute %Ds ranged from 2.7 at the Lagunilla station to 8.4 at the Xalostoc station. Additionally, when evaluating each audit concentration result across monitors using the 96% probability criterion, the lowest audit concentration exceeded the 15% D criterion at +15.7 % D.



3. Carbon Monoxide (CO)

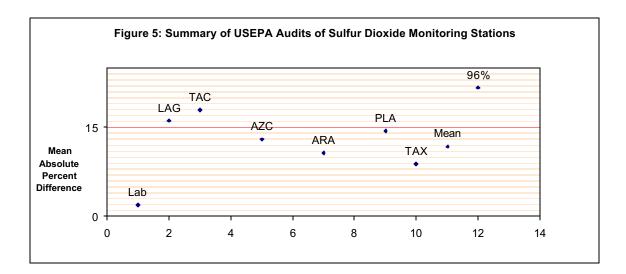
USEPA evaluated Carbon Monoxide monitors at eight monitoring locations. The mean absolute %Ds ranged from 1.9 at the Taxqueña station to 10.6 at the Tacuba station. Additionally, when evaluating each audit concentration result across monitors using the 96% probability criterion, the lowest audit concentration exceeded the 15% D criterion with a range of -18 to +24 %D.



4. Sulfur Dioxide (SO₂)

USEPA evaluated Sulfur Dioxide monitors at seven monitoring locations and the Sulfur Dioxide monitor at the GDF laboratory. The mean absolute %Ds ranged from 1.9 at the laboratory to 17.9 at the Tacuba station. In addition to Tacuba, the Lagunilla station also exceeded the mean absolute criterion at 16.1 %D. Additionally, when evaluating each audit concentration result across monitors using the

96% probability criterion, the lowest audit concentration exceeded the 15% D criterion with a range of -23.9 to +37.1 %D, and the mean absolute range exceeded the criterion at 19.6%. It was also noted that the Sulfur Dioxide blank readings and predicted blank concentration range were high.



B. Audits conducted by the GDF using USEPA audit system

1. <u>Re-Audits</u>

a) <u>Ozone (O3)</u>

The GDF auditor re-evaluated Ozone monitors at four monitoring locations. The %D criterion was met by all evaluations.

b) <u>Nitric Oxide (NO)</u>

The GDF auditor re-evaluated Nitric Oxide monitors at four monitoring locations. The mean absolute %Ds met the 15 percent criterion at all stations. However, when evaluating each audit concentration result across monitors using the 96% probability criterion, the lowest audit concentration exceeded the 15% D criterion at +17.6 % D.

c) Carbon Monoxide (CO)

The GDF auditor re-evaluated Carbon Monoxide monitors at four monitoring locations. The mean absolute %Ds met the 15 percent criterion at all stations. However, when evaluating

each audit concentration result across monitors using the 96% probability criterion, the lowest audit concentration exceeded the 15% D criterion with a range of -23.9 to +22.8 %D.

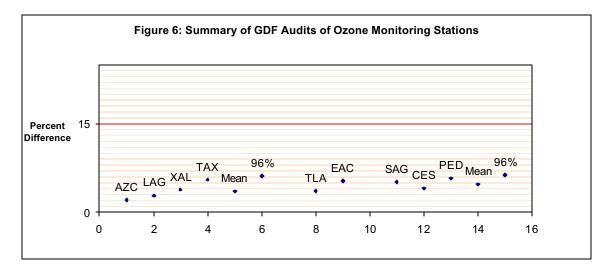
d) Sulfur Dioxide (SO₂)

The GDF auditor re-evaluated Sulfur Dioxide monitors at four monitoring locations. The mean absolute %Ds met the 15 percent criterion at all stations. However, when evaluating each audit concentration result across monitors using the 96% probability criterion, the lowest audit concentration exceeded the 15% D criterion at +25.7 % D. It was also noted that the one Sulfur Dioxide blank reading and the predicted blank concentration range were high.

2. <u>New Audits</u>

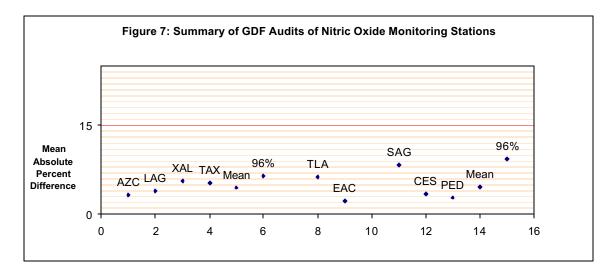
a) <u>Ozone (O₃)</u>

The GDF auditor evaluated Ozone monitors at six monitoring locations. The %D criterion was met by all evaluations.



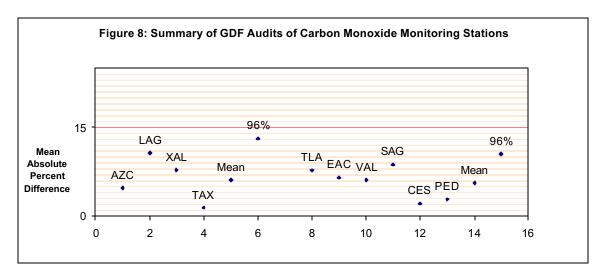
b) <u>Nitric Oxide (NO)</u>

The GDF auditor evaluated Nitric Oxide monitors at six monitoring locations. The %D criterion was met by all evaluations.



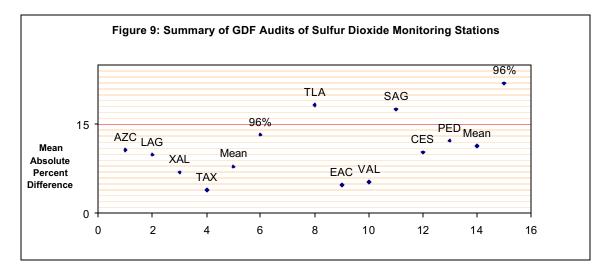
c) Carbon Monoxide (CO)

The GDF auditor evaluated Carbon Monoxide monitors at six monitoring locations. The mean absolute %Ds met the 15 percent criterion at all stations. However, when evaluating each audit concentration result across monitors using the 96% probability criterion, the lowest audit concentration exceeded the 15% D criterion at +20.0 % D.



d) Sulfur Dioxide (SO₂)

The GDF auditor evaluated Sulfur Dioxide monitors at six monitoring locations. The mean absolute %Ds ranged from 4.8 at ENEP Acatlán station to 18.2 at the Tlanepantla station. In addition to Tlanepantla, the San Agustín station also exceeded the mean absolute criterion at 17.5 %D. Additionally, when evaluating each audit concentration result across monitors using the 96% probability criterion, the mid-level audit concentration exceeded the %D criterion at +17.1, and the lowest audit concentration exceeded the 15% D criterion at +38 %D, and the mean absolute range exceeded the criterion at 21.9%. It was also noted that the Sulfur Dioxide blank readings and predicted blank concentration range were high.



C. Evaluation

1. **Ozone (O**₃)

The audits conducted by USEPA and the GDF using the USEPA NPAP audit system found no significant bias in the monitors measured. USEPA's simple statistical evaluation of the data did not indicate any potential for bias in the remainder of the network. These findings indicate that there has been data quality improvement in the Ozone monitoring since CY 2000.

2. <u>Nitric Oxide (NO)</u>

The Nitric Oxide audit data indicates the potential for a high bias at the lowest concentration audited. Measurement error at the lower end of an instrument's linear range is common in monitoring networks. The audit data from CY 2003 demonstrated some improvement from CY 2000.

3. Carbon Monoxide (CO)

The Carbon Monoxide audit data indicate imprecision at the lowest concentration audited. Measurement error at the lower end of an instrument's linear range is common in monitoring networks.

4. <u>Sulfur Dioxide (SO₂)</u>

The Sulfur Dioxide audit data indicate significant imprecision and bias at the lowest audit concentration. The potential for high bias was also evident at the mid level audit concentration. The blank concentrations were also significantly elevated at some stations. The stations that were re-audited did show some improvement.

D. <u>Recommendations</u>

The performance audits indicate that there may be significant bias and imprecision in the low concentration Sulfur Dioxide data being produced by the network. The GDF should put in place a formal corrective action process to identify and eliminate this quality concern. Part of the bias observed is evidenced by elevated blank readings. The GDF should evaluate how calibrations are performed for these instruments, calibration frequency, and the potential for baseline drift. The GDF may also want to evaluate the maintenance schedule used for the Sulfur Dioxide instruments, as a positive bias could also be caused by lack of regular maintenance (e.g. a dirty reaction cell).

The performance audits indicate that it would be beneficial to improve monitoring accuracy at low Carbon Monoxide and Nitric Oxide concentrations. These could be evaluated by the QA and monitoring managers as part of their routine quality improvement process.

The GDF should investigate the feasibility of purchasing an "Ultrapure" air standard that meets USEPA protocol gas requirements. This would serve as an independent verification of instrument zero points and as a tool to evaluate the zero air scrubbers currently being used.

The GDF should institute a routine performance audit program utilizing internal, independent staff and independent monitoring equipment and standards.

V. System Evaluation

USEPA has included some system observations as part of this report. These observations, while not part of a comprehensive TSA or MSR, may be helpful to the GDF in making improvements to its monitoring network and its quality system. USEPA ORD staff also made system observations during their CY 2000 performance audits. They observed little documentation of how monitoring system quality was being controlled. Noticeable, recent improvements to the air monitoring quality system were evident during the CY 2003 audits.

A. Quality System

The quality system in place at the GDF is an emerging system. Many quality control processes had been recently implemented. There were signs that a well thought out Quality Management System is being developed. Several staff are assigned QA responsibilities, and a draft quality management plan is being developed. This draft plan incorporates many quality concepts from the ISO 9000 quality standards and related quality standards used in the United States for collection of environmental information.

B. Technical Observations

It was noted that the most recent multipoint calibration information was not readily available at the monitoring stations, and was not easily retrieved for all monitors when requested. This is easily remedied by making a copy of these documents to remain at the monitoring stations. This finding, which needs to be addressed, is an improvement over the CY 2000 audits where it was noted, "It appears that multipoint calibrations are performed at regular intervals; however, no documentation of the frequency of the calibrations was provided."

C. <u>Network Observations</u>

A formal network review was not performed. However, it is recommended that the monitoring network be formally reviewed based on current monitoring needs. The number of monitoring stations associated with gaseous pollutants which are at concentrations below regulatory limits seems high. However, the number and location of Ozone monitoring sites may need to be re-assessed based on urban growth and an evaluation of modeled and measured Ozone concentrations. This may result in a recommendation to add and/or shift Ozone monitoring into outlying areas where high Ozone concentrations are expected.

D. Site Evaluation Summary

Individual site evaluations are included in Appendix A.

Generally the stations were kept up well and the manifolds that could be seen were clean. The site operators were knowledgeable and worked cooperatively with the auditors.

The structure housing the Azcapotzalco monitoring equipment should be repaired or replaced. The plywood construction is rotting in several places and rain water is getting into the monitoring station. Several of the sites were obstructed by trees and/or buildings. Where trees obstruct the flow around the probe or provide a potential surface for scavenging pollutants, the offending trees should be trimmed or removed. Alternatively, the probe height may be increased. Increasing probe height should also be considered where air flow is obstructed by a building.

The Taxqueña site is located close to a busy roadway. This may adversely impact the representativeness of data for Ozone and Oxides of Nitrogen. These parameters should be measured at a location an appropriate distance from the roadway.

There are currently 5 station operators, each with responsibility for 5-6 stations. This ratio is higher than can be expected to effectively operate a monitoring network. This is compounded by travel time considerations between monitoring stations.

E. <u>Recommendations</u>

The GDF should implement annual internal Technical System Audits to improve and maintain the quality of data being produced. Occasional external system audits should also be performed.

APPENDIX A

Station Evaluations and Result Data from USEPA Audits

Third of November 2003

1:00 PM - Audit of laboratory monitors.

Ozone

NO

Site	Lab						Site	Lab					
Audit date	3-Nov	z/s date		cal date	31-Oc	t-03	audit date	3-Nov	z/s date		cal date		
Man.	API	Model	400A	S/N		888	Man.	API	Model	200A	S/N		2356
		P mm Hg	590.7	T deg C		19.5			P mm Hg	593.2	T deg C		19.5
Setting	Result			Audit C.	% D		Setting	Result			Audit C.	% D	
Zero	0.3	1		.3			1,3	427.1			405.16	5.4	
485	405.7			407	-0.3		2,3	190.1			181.38	4.8	
350	175.8			178.9	-1.7		3	45.2			45.00	1.6	
255	54.5			52.7	3.3		1,3	427.7					
				Mean			Zero	-1.9			0		
				Abs	1.8								
											MA	3.9	

SO2

site	Lab					
audit date	3-Nov	z/s date		cal date		
Man.	API	Model	100A	S/N		1707
		P mm Hg	593.2	T deg C		19.5
Setting	Result			Audit C.	% D	
1,3	381.6			375.22	1.7	
2,3	172.1			167.97	2.5	
3	41			41.67	-1.6	
1,3	384.3					
Zero	-1.7			0		
				MA	1.9	



Ozone

Fourth of November 2003

 $8:30 \mbox{ AM}-Lagunilla Station Audit <math display="inline">\mbox{ O}_3, \mbox{ NO}, \mbox{ SO}_2,$ and CO

Station Operator: Ernesto Ismael León Díaz Downtown and Northeast Team

This station is in the first floor storage room of a two-story health center. The probe is long in order to clear the adjacent building. The manifold/inlet is Teflon and but has a plastic connector. The cap is missing from the inlet at this site. Any of these may impact the quality of data from this site and lead to data with a low bias.

NO

Site	LAG					
Audit date	4-Nov	z/s date	31-Oct-03	cal date		
Man.	API	Model	400	S/N		443
		P mm Hg	580	T deg C		22.6
Setting	Result			Audit C.	% D	
Zero	1.4			0.3		
485	394.4			404.1	-2.4	
350	170.3			177.6	-4.1	
255	53.2			52.4	1.6	
Zero	-0.4					
				MA	2.7	

Site	LAG				
audit date	4-Nov	z/s date	31-Oct	cal date	23-Oct-03
Man.	API	Model	200	S/N	232
		P mm Hg	580	T deg C	22.4
Setting	Result			Audit C.	% D
1,3	409.1			405.16	1.0
2,3	183.9			181.38	1.4
3	47.6			45	5.8
1,3	409.1				
Zero	1.5			0	
				MA	2.7

SO2

CO

Site	LAG					
Audit date	4-Nov	z/s date	31-Oct	cal date	31-Oct-03	3
Man.	API	Model	100	S/N	237	7
		P mm Hg	580	T deg C	22.0	5
Setting	Result			Audit C.	% D	
1,3	399.1			375.22	6.4	
2,3	183.9			167.97	9.5	
3	55.2			41.67	32.5	
1,3	396.4					
Zero	11.3			0		
				MA	16.1	

site	LAG					
audit date	4-Nov	z/s date	31-Oct	cal date		
Man.	API	Model	300	S/N		112
		P mm Hg	580	T deg C		22.6
Setting	Result			Audit C.	% D	
1,3	43			40.94	5.0	
2,3	20			18.33	9.1	
3	5.2			4.55	14.3	
1,3	43.1					
Zero	0.5			0.00	0.5	
				MA	9.5	



representative of residential and industrial exposures.

Fourth of November 2003

12:00 PM – Tacuba Station Audit O₃, NO, SO₂, and CO

Station Operator: Ernesto Ismael León Díaz Downtown and Northeast Team

This station is in a shed on top of the second floor of a health center. This site is well situated and is

Ozone

Site TAC Tacuba audit date 4-Nov z/s date 27-Oct-03 cal date API 400 S/N Man. Model 442 P mm Hg 581 T deg C 22.6 Audit C. % D Result Setting Zero 0.3 0.3 485 394.1 404.4 -2.5 350 173.6 177.7 -2.3 53.3 255 52.4 1.7 0.9 Zero 2.2 MA

site	TAC	Tacuba				
audit date	4-Nov	z/s date	27-Oct	cal date		
Man.	API	Model	200	S/N		226
		P mm Hg	581	T deg C		22.6
Setting	Result			Audit C.	% D	
1,3	429			405.16	5.9	
2,3	194			181.38	7.0	
3	51			45	13.3	
1,3	452					
Zero	2			0		
				MA	8.7	

SO2

CO

Site	TAC	Tacuba				
audit date	4-Nov	Z/s date	27-Oct	cal date		
Man.	API	Model	100	S/N		501
		P mm Hg	581	T deg C		22.6
Setting	Result			Audit C.	% D	
1,3	447			375.22	10.3	
2,3	191			167.97	13.7	
3	54			41.67	29.6	
1,3	415					
Zero	6			0		
				MA	17.9	

site	TAC	Tacuba					
audit date	4-Nov	z/s date	27-Oct	Cal date			
Man.	API	Model	300	S/N		6	76
		P mm Hg	581	T deg C		22	2.6
Setting	Result			Audit C.	% D		
1,3	43.7			40.94	6.7		
2,3	19.9			18.33	8.6		
3	5.3			4.55	16.5		
1,3	43.8						
Zero	-0.1			0			
				MA	10.6		

NO

Fourth of November 2003

5:30 PM – Metro Insurgentes Audit CO

Station Operator: Ernesto Ismael León Díaz Downtown and Northeast Team

This site is a small building (kiosk) in a plaza, which is a metro station entrance, and in the middle of a traffic circle. While it was indicated that there are problems with vandalism at this site, this site is a good choice for measuring localized CO exposures.

CO

site	MIN				
audit date	4-Nov	z/s date	28-Oct	cal date	
Man.	TECO	Model	48	S/N	ACM13650-140
		P mm Hg	580	T deg C	22.6
Setting	Result			Audit C.	% D
1,3	43.4			40.94	6.0
2,3	19.5			18.33	6.4
3	4.9			4.55	7.7
1,3	43				
Zero	0.2			0	
				MA	6.7



Ozone

Fifth of November 2003

9:00 AM Azcapotzalco AZC Audit O₃, NO, SO₂, and CO

Station Operator: Cristian Gómez Rodríguez Downtown and Northeast Team

This station is in a residential neighborhood on a health center next to a park. There are no major streets adjacent to this site. This is a good site and representative of residential nosource impacted exposures. The structure, while of sufficient size, is constructed out of plywood that is beginning to rot, and should be replaced.

NO

site	AZC A	Azcapotza	lco			
audit date	5-Nov	z/s date	29-Oct-03	cal date		
Man.	API	Model	400	S/N		793
		P mm Hg	574.6	T deg C		19.8
Setting	Result			Audit C.	% D	
Zero	0.7			0.3		
485	394.8			402.6	-1.9	
350	166.8			176.9	-5.7	
255	51.5			52.2	-1.3	
Zero	0.7					
Zero	0.1					
				MA	3.0	

site	AZC A	Azcapotzal	lco			
audit date	5-Nov	z/s date	20-Oct	cal date		
Man.	API	Model	200	S/N		496
		P mm Hg	574.6	T deg C		19.8
Setting	Result			Audit C.	% D	
1,3	412.4	424.2		405.16	1.8	
2,3	174.2	189.2		181.38	-4.0	
3	46.8	48.8		45	4.0	
1,3	427	419.8				
Zero	1.2	1.8		0		
				MA	3.2	

SO2

site	AZC A	Azcapotza	lco			
audit date	5-Nov	z/s date	20-Oct	cal date		
Man.	API	Model	100	S/N		496
		P mm Hg	574.6	T deg C		19.8
Setting	Result			Audit C.	% D	
1,3	410.4			375.22	9.4	
2,3	176.1			167.97	4.8	
3	51.9			41.67	24.6	
1,3	422					
Zero	5.6			0		
				MA	12.9	

site	AZC A	Azcapotza	lco			
audit date	5-Nov	z/s date	20-Oct	cal date		20-Oct-03
Man.	API	Model	300	S/N		309
		P mm Hg	574.6	T deg C		19.8
Setting	Result			Audit C.	% D	
1,3	43.1			40.94	5.3	
2,3	19.1			18.33	4.2	
3	4.5			4.55	-1.1	
1,3	42.7					
Zero	-0.1			0		
				MA	3.5	



Fifth of November 2003

12:00 PM Xalostoc XAL Audit O₃, NO, SO₂, and CO

Station Operator: Ernesto Ismael León Díaz Downtown and Northeast Team

This site is in an industrial and commercial area. The site is in a shed on the back lot of a car dealership.

Ozone

NO

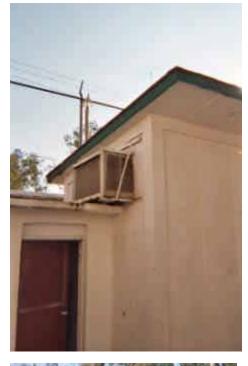
site	XAL						site	XAL					
audit date	e 5-Nov	z/s date	24-Oct-03	cal date			audit date	e 5-Nov	z/s date	30-Oct	cal date		
Man.	API	Model	400	S/N		447	Man.	API	Model	200	S/N		521
		P mm Hg	585.1	T deg C		18.9			P mm Hg	585.1	T deg C		18.9
Setting	Result			Audit C.	% D		Setting	Result			Audit C.	% D	
Zero	1.6			0.3			1,3	434.1	438.5		405.16	5.0	
485	396.8			405.5	-2.1		2,3	193.8	194		181.38	6.9	
350) 174			178.2	-2.4		3	51	51.5		45	13.3	
255	5 54.5			52.5	3.7		1,3	431.4	435.1				
Zero	1.6						Zero	3.8	3		0		
				MA	2.7						MA	8.4	

SO2

CO

site	XAL					
audit date	5-Nov	z/s date	3-Nov	cal date		
Man.	API	Model	100	S/N		497
		P mm Hg	585.1	T deg C		18.9
Setting	Result			Audit C.	% D	
1,3				375.22	4.8	
2,3	177.6			167.97	5.7	
3	44.8			41.67	7.5	
1,3	395.7					
Zero	0.7			0		
1,3	393.2					
				MA	6.0	

site	XAL					
audit date	5-Nov	z/s date	30-Oct	cal date		
Man.	API	Model	300	S/N		308
		P mm Hg	585.1	T deg C		18.9
Setting	Result			Audit C.	% D	
1,3	41.3			40.94	0.9	
2,3	18.2			18.33	-0.7	
3	3.9			4.55	-14.3	
1,3	40.7					
Zero	-0.4			0		
				MA	5.3	





Fifth of November 2003

5:00 PM Aragon ARA Audit SO_2 and CO

Station Operator: Ernesto Ismael León Díaz Downtown and Northeast Team

This site is located in a residential area adjacent to a park. The station is a small shed behind a senior center. The streets around the site are wide but not heavily traveled. The probe height is just above the shed roof. There are several large trees to the north which block part of the prevailing wind direction. There is also a portion of the senior center that is higher than the probe. The trees north of the station should be trimmed or removed and the probe should be elevated. However the value of this site for SO₂ and CO monitoring should be considered before investing in upgrades to this station.

SO2

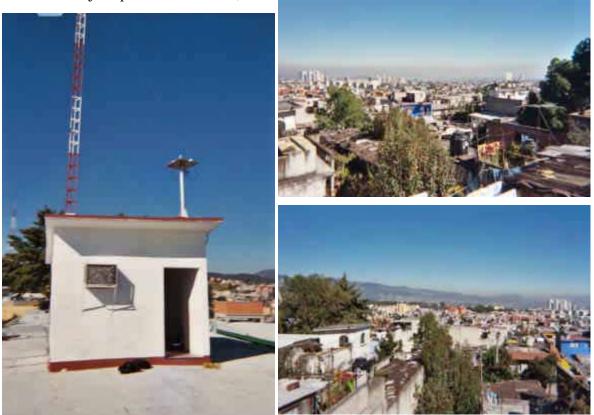
site	ARA					
audit date	5-Nov	z/s date	23-Oct	cal date		
Man.	API	Model	100	S/N		461
		P mm Hg	585.9	T deg C		17.6
Setting	Result			Audit C.	% D	
1,3	400.7			375.22	6.8	
2,3	179.2			167.97	6.7	
3	49.4			41.67	18.6	
1,3	394.8					
Zero	3.5			0		
				MA	10.7	

C)	

-					1	
site	ARA					
audit date 5-Nov		z/s date	23-Oct	cal date		
Man.	TECO	Model	48	S/N		33065-243
		P mm Hg	585.9	T deg C		17.6
Setting	Result			Audit C.	% D	
1,3	40.7			40.94	-0.6	
2,3	18			18.33	-1.8	
3	4.2			4.55	-7.7	
1,3	40.2					
Zero	-0.2			0		
				MA	3.4	

Sixth of November 2003

9:45 AM Cuajimalpa CUA Audit O3



Station Operator: Julio Cesar Argueta Rodriguez

This site is in a residential area in a mountainous region west of Mexico City. The station is in a fair sized shed on top of the second floor of a school.

Ozone

site CUA Cuajimalpa						
audit date	e 6-Nov	z/s date	3-Nov-03	cal date		
Man.	API	Model	400A	S/N		131
		P mm Hg	557.9	T deg C		18.7
Setting	Result			Audit C.	% D	
Zero	1.1			0.3		
485	375.9			398.1	-5.6	
350	162.7			175.0	-7.0	
255	51.1			51.6	-1.0	
				MA	4.5	



Ozone

Sixth of November 2003

12:15 PM Plateros PLA O_3 , NO, SO₂, and CO

Station Operator: Julio Cesar Argueta Rodriguez

This site is located in a residential area. The site is in the back of a health center parking lot in a small shed. There are many trees in the area and there are several trees directly adjacent to the site. Because the inlet is just above the roof of the shed and these trees are blocking a significant portion of the area around the site, it is recommended that a combination of raising the probe height and cutting back trees be undertaken to make this site more suitable.

NO

site	PLA P	lateros				
audit date	6-Nov	z/s date		cal date		
Man.	API	Model	400A	S/N		262
		P mm Hg	582.3	T deg C		18.2
Setting	Result			Audit C.	% D	
Zero	1.6			0.3		
485	420			404.7	3.8	
350	182.3			177.9	2.5	
255	57.3			52.5	9.2	
Zero	1.4					
				MA	5.2	

site PLA Plateros audit date 6-Nov z/s date cal date 200 S/N 498 Man. API Model P mm Hg 582.3 T deg C 18.2 Result Audit C. % D Setting 405.16 1,3 422.8 423 4.4 2,3 188.2 189.2 181.38 3.8 48.4 46.7 45.00 7.6 428.2 425.5 1,3 -1.2 Zero -0.4 0 MA 5.2

SO2

CO

site	PLA F	lateros				
audit date	e 6-Nov	z/s date		cal date		
Man.	API	Model	100	S/N		500
		P mm Hg	582.3	T deg C		18.2
Setting	Result			Audit C.	% D	
1,3	402.9			375.22	7.4	
2,3	185.2			167.97	10.3	
3	52.2			41.67	25.3	
1,3	407.3					
Zero	3.4			0		
				MA	14.3	

site	PLA B	Plateros				
audit date	6-Nov	z/s date		cal date		
Man.	API	Model	300	S/N		1160
		P mm Hg	582.3	T deg C		18.2
Setting	Result			Audit C.	% D	
1,3	42.8			40.94	4.5	
2,3	19.2			18.33	4.7	
3	5.2			4.55	14.3	
1,3	42.7					
Zero	0			0		
				MA	7.9	



Seventh of November 2003

10:00 AM Taxqueña TAX

Station Operator: Arturo Navarrete Miranda

This site is in the front yard of an elementary school. There is a road adjacent to the site, which appears to be heavily traveled. This site is appropriate for measuring CO exposure, however other monitoring should be moved away from the roadway.

Ozone

NO

site	TAX 7	Гахqueña					site	TAX	Taxqueña				
audit date	7-Nov	z/s date	28-Oct	cal date			audit date	7-Nov	z/s date	28-Oct	cal date		
Man.	API	Model	400	S/N		229	Man.	API	Model	200	S/N		525
		P mm Hg	583.8	T deg C		18.3			P mm Hg	583.8	T deg C		18.3
Setting	Result			Audit C.	% D		Setting	Result			Audit C.	% D	
Zero	1			0.3			1,3	420			405.16	3.7	
485	412			405.1	1.7		2,3	189			181.38	4.2	
350	184			178.0	3.3		3	48			45.00	6.7	
255	57			52.5	8.6		1,3	412					
Zero	3						Zero	-2			0		
				MA	4.5						MA	4.8	

SO2

CO

-						
site	TAX 7	Гахqueña				
audit date	e 7-Nov	z/s date	28-Oct	cal date		
Man.	API	Model	100	S/N	252	
		P mm Hg	583.8	T deg C		18.3
Setting	Result			Audit C.	% D	
1,3	397			375.22	5.8	
2,3	181			167.97	7.8	
3	47			41.67	12.8	
1,3	390					
Zero	3			0		
				MA	8.8	

site	TAX	Taxqueña				
audit date	7-Nov	z/s date	28-Oct	cal date		
Man.	API	Model	300	S/N	1168	
		P mm Hg	583.8	T deg C		18.3
Setting	Result			Audit C.	% D	
1,3	41			40.94	0.1	
2,3	18.3			18.33	-0.2	
3	4.8			4.55	5.5	
1,3	41					
Zero	0			0		
				MA	1.9	

APPENDIX B

GDF Audit Data

SITE IDTAXQUEÑA	
MONITOR MANUFACTURED_	API
MONITOR SERIAL	229
MONITOR MODEL	400
AIR TEMPERATURE NEAR MO	NITOR18.9
SITE BAROMETRIC PRESSURE	579.8
DATE FOR AUDIT12-0	4-03

POTENTIOMETER SETTING	RESULTS IN PPB
ZERO	2.0
485	382
350	167
255	55
ZERO	2.0

SITE IDCERRO DE LA EST	FRELLA
MONITOR MANUFACTURED	API
MONITOR SERIAL	438
MONITOR MODEL	400
AIR TEMPERATURE NEAR MO	NITOR21.3
SITE BAROMETRIC PRESSURE	576.8
DATE FOR AUDIT	12-03-03

POTENTIOMETER SETTING	RESULTS IN PPB
ZERO	-0.1
485	382.9
350	167.0
255	51.7
ZERO	0.4

SITE ID	_LAGUNILLA					
MONITOR MANU	FACTUREDA	API				
MONITOR SERIA	L	_443				
MONITOR MODE	L	400				
AIR TEMPERATURE NEAR MONITOR20						
SITE BAROMETR	IC PRESSURE	581.29				
DATE FOR AUDIT	Г12-(01-03				

POTENTIOMETER SETTING	RESULTS IN PPB
ZERO	0.4
485	389.4
350	170.3
255	52.1
ZERO	0.1

SITE ID	_AZCAPOTZALC	CO
MONITOR MANU	FACTURED	_API
MONITOR SERIA	L	793
MONITOR MODE	L	_400
AIR TEMPERATU	RE NEAR MONIT	OR21.1
SITE BAROMETR	IC PRESSURE	581.9
DATE FOR AUDIT		7-03

POTENTIOMETER SETTING	RESULTS IN PPB
ZERO	-0.8
485	394.5
350	174.1
255	53.2
ZERO	-2.0

SITE ID	TLALNEPANT	LA	
MONITOR MANU	FACTURED	API	
MONITOR SERIA	L	794_	
MONITOR MODE	L	4	00
AIR TEMPERATU	RE NEAR MON	ITOR	_22.3
SITE BAROMETR	IC PRESSURE_		576.7
DATE FOR AUDIT	Г 1	1-27-03	

POTENTIOMETER SETTING	RESULTS IN PPB
ZERO	2.9
485	399.6
350	175.5
255	56.9
ZERO	2.9

SITE ID	_ENEP ACATLAN	
MONITOR MANU	FACTUREDAF	PI
MONITOR SERIAL	L:	159
MONITOR MODEI	L4(00
AIR TEMPERATU	RE NEAR MONITOR_	16.6
SITE BAROMETR	IC PRESSURE	579.0
DATE FOR AUDIT	11-28-03	

POTENTIOMETER SETTING	RESULTS IN PPB
ZERO	1.2
485	377.0
350	164.5
255	53.3
ZERO	2

SITE ID	_XALOSTOC
MONITOR MANUFA	CTUREDAPI
MONITOR SERIAL_	447
MONITOR MODEL_	400
AIR TEMPERATURE	NEAR MONITOR16.7
SITE BAROMETRIC	PRESSURE578.3
DATE FOR AUDIT	12-02-03

POTENTIOMETER SETTING	RESULTS IN PPB
ZERO	1.6
485	381.8
350	167.0
255	52.4
ZERO	1.5

SITE ID	SAN AGUSTIN	
MONITOR MANUI	FACTUREDAPI	
MONITOR SERIAI	440	
MONITOR MODEI	400	0
AIR TEMPERATUR	RE NEAR MONITOR	20.7
SITE BAROMETRI	C PRESSURE	_576.79
DATE FOR AUDIT	12-02-03	

POTENTIOMETER SETTING	RESULTS IN PPB
ZERO	3.3
485	383.6
350	168.6
255	55.2
ZERO	4.2

SITE ID	PEDREGAL
MONITOR MANUFACT	UREDAPI
MONITOR SERIAL	257
MONITOR MODEL	400A
AIR TEMPERATURE NI	EAR MONITOR22.4
SITE BAROMETRIC PR	ESSURE572.3
DATE FOR AUDIT	12-04-03

POTENTIOMETER SETTING	RESULTS IN PPB
ZERO	1.2
485	371.3
350	163.2
255	51.1
ZERO	1.1

NO PERFORMANCE AUDIT SITE ID	_TAXQUEÑA
MONITOR MANUFACTURED	API
MONITOR SERIAL	525
MONITOR MODEL	200
AIR TEMPERATURE NEAR M	ONITOR18.9
SITE BAROMETRIC PRESSUR	E579.8
DATE FOR AUDIT	12-04-03

POINT	VALVES	NO (PPB)	Nox (PPB)	NO2 (PPB)
	OPEN			
1	1,3	386	391	5
2	2,3	173	175	3
3	3	42	46	4
4	1,3	387	392	4
ZERO	All valves	1	0	0
	closed			
1	1,3	389	391	2
2	2,3	173	177	4
3	3	44	47	3
4	1,3	388	390	3
ZERO	All valves	1	1	0
	closed			

SITE ID _____CERRO DE LA ESTRELLA _____ MONITOR MANUFACTURED _____API _____ MONITOR SERIAL _____533 _____ MONITOR MODEL _____200 _____ AIR TEMPERATURE NEAR MONITOR ___21.3 _____ SITE BAROMETRIC PRESSURE ____576.8 _____

DATE FOR AUDIT_____12-03-03_____

POINT	VALVES	NO (PPB)	Nox (PPB)	NO2 (PPB)
	OPEN			
1	1,3	406.0	411.5	5.1
2	2,3	183.6	184.4	0.9
3	3	49	47.6	-1.3
4	1,3	405.5	408.2	2.5
ZERO	All valves	2.3	3.7	1.5
	closed			
1	1,3	408.4	405.8	-2.2
2	2,3	182.4	183.3	1.7
3	3	49.1	47.3	-1.7
4	1,3	407.6	407.6	-0.2
ZERO	All valves	2	1.6	0.1
	closed			

SITE ID	_LAGUNILLA
MONITOR MANUFACTU	JREDAPI
MONITOR SERIAL	232
MONITOR MODEL	200
AIR TEMPERATURE NEA	AR MONITOR20
SITE BAROMETRIC PRES	SSURE581.29
DATE FOR AUDIT	12-01-03

POINT	VALVES	NO (PPB)	Nox (PPB)	NO2 (PPB)
	OPEN			
1	1,3	414.3	418.5	4.7
2	2,3	186.2	189.7	4.0
3	3	48.1	51.5	3.7
4	1,3	414.8	421.0	4.9
ZERO	All valves	3.0	4.9	1.7
	closed			
1	1,3	416.5	418.5	2.0
2	2,3	187.2	192.4	5.4
3	3	46.9	52.4	5.9
4	1,3	413.6	418.3	5.7
ZERO	All valves	1.7	5.1	3.0
	closed			

SITE ID	AZCAPOTZALCO			
MONITOR MANUFACTU	REDAPI			
MONITOR SERIAL	793			
MONITOR MODEL	400			
AIR TEMPERATURE NEA	R MONITOR21.1			
SITE BAROMETRIC PRES	SSURE581.9			
DATE FOR AUDIT	11-27-03			

POINT	VALVES	NO (PPB)	Nox (PPB)	NO2 (PPB)
	OPEN			
1	1,3	410.8	419.8	9.4
2	2,3	187.8	192.8	6.7
3	3	47.1	66.2	19.2
4	1,3	412.5	437.0	24.2
ZERO	All valves	2.5	47.6	46.1
	closed			
1	1,3	417.4	461.2	42.6
2	2,3	188.9	213.4	24.3
3	3	46.8	70.9	20.9
4	1,3	416.9	430.9	13.8
ZERO	All valves	1.0	14.3	13.3
	closed			

SITE ID	TLALNEPANTL	A
MONITOR MANU	FACTURED	_API
MONITOR SERIAL	526_	
MONITOR MODE	L200	0
AIR TEMPERATUI	RE NEAR MONITOR	R22.3
SITE BAROMETRI	IC PRESSURE	576.7
DATE FOR AUDIT	, 	_11-27-03

POINT	VALVES	NO (PPB)	Nox (PPB)	NO2 (PPB)
	OPEN			
1	1,3	425.3	432.0	6.4
2	2,3	191.6	199.3	7.1
3	3	48.8	53.4	4.7
4	1,3	426.1	429.6	2.7
ZERO	All valves	-0.6	6.4	7.1
	closed			
1	1,3	428.3	428.4	0.3
2	2,3	191.7	196.6	4.2
3	3	47.6	53.4	5.9
4	1,3	426.3	428.6	1.7
ZERO	All valves	-0.3	4.7	5.1
	closed			

SITE ID	_ENEP ACATLA	AN
MONITOR MANU	JFACTURED	API
MONITOR SERIA	۸L	_225
MONITOR MODE	EL	_200
AIR TEMPERATU	JRE NEAR MON	ITOR16.6
SITE BAROMET	RIC PRESSURE_	579
DATE FOR AUDI	T11-28	8-03

POINT	VALVES	NO (PPB)	Nox (PPB)	NO2 (PPB)
	OPEN			
1	1,3	415.3	414.9	-0.7
2	2,3	183.0	186.0	2.2
3	3	46.5	47.2	0.9
4	1,3	413.4	412.9	-1.0
ZERO	All valves	0.7	1.4	0.7
	closed			
1	1,3	416.8	413.4	-3.4
2	2,3	187.2	187.7	-1.0
3	3	47.0	48.4	1.2
4	1,3	418.8	412.2	-6.6
ZERO	All valves	-1.0	2.9	3.7
	closed			

SITE ID	XALOSTOC		
MONITOR MANUFACTU	REDAPI		
MONITOR SERIAL	521		
MONITOR MODEL	200		
AIR TEMPERATURE NEA	AR MONITOR16.7		
SITE BAROMETRIC PRE	SSURE578.3		
DATE FOR AUDIT	12-02-03		

POINT	VALVES	NO (PPB)	Nox (PPB)	NO2 (PPB)
	OPEN			
1	1,3	412.8	414.2	1.5
2	2,3	187.4	189.9	2.5
3	3	50.2	50.9	0.8
4	1,3	413.1	413.7	0.3
ZERO	All valves	2.9	4.3	1.3
	closed			
1	1,3	415.3	414.0	-1.1
2	2,3	190.6	190.9	1.0
3	3	50.0	49.9	0.1
4	1,3	414.5	417.1	2.3
ZERO	All valves	2	2.4	2.3
	closed			

SITE ID	SAN AGUSTIN		
MONITOR MANU	FACTURED	API	
MONITOR SERIAL	L	232	
MONITOR MODE	L	200	
AIR TEMPERATUF	RE NEAR MONI	TOR2	20.7
SITE BAROMETRI	C PRESSURE_	576	5.8
DATE FOR AUDIT	, 	12-02-03	

POINT	VALVES	NO (PPB)	Nox (PPB)	NO2 (PPB)
	OPEN			
1	1,3	426.3	428.4	1.6
2	2,3	193.3	197.5	1.8
3	3	50.9	52.6	1.1
4	1,3	428.8	431.1	1.4
ZERO	All valves	2.1	5.9	3.8
	closed			
1	1,3	434.1	434.0	-0.3
2	2,3	196.5	197.2	0.4
3	3	50.6	57.7	6.5
4	1,3	434.3	432.7	-2.8
ZERO	All valves	3.0	4.6	2.1
	closed			

SITE ID	_PEDREGAL
MONITOR MANUFA	CTUREDAPI
MONITOR SERIAL_	_577
MONITOR MODEL_	200
AIR TEMPERATURE	E NEAR MONITOR22.4
SITE BAROMETRIC	PRESSURE572.3
DATE FOR AUDIT	12-04-03

POINT	VALVES	NO (PPB)	NOx (PPB)	NO2 (PPB)
	OPEN			
1	1,3	401.4	398.3	-1.1
2	2,3	180.6	179.0	-0.1
3	3	48.2	46.0	-0.6
4	1,3	407.6	404.3	-1.8
ZERO	All valves	5.0	3.0	-0.6
	closed			
1	1,3	406.6	408.5	2.8
2	2,3	186.0	185.7	2.1
3	3	50.2	49.2	0.3
4	1,3	410.1	407.3	-1.1
ZERO	All valves	3.5	3.3	1.6
	closed			

SITE ID	TAXQUEÑA		
MONITOR MANUFAC	ГUREDAPI		
MONITOR SERIAL	525		
MONITOR MODEL	200		
AIR TEMPERATURE N	EAR MONITOR18.9		
SITE BAROMETRIC PR	RESSURE579.8		
DATE FOR AUDIT	12-04-03		

POINT	VALVES	NO (PPB)	NOx (PPB)	NO2 (PPB)
	OPEN			
1	1,3	386	391	5
2	2,3	173	175	3
3	3	42	46	4
4	1,3	387	392	4
ZERO	All valves	1	0	0
	closed			
1	1,3	389	391	2
2	2,3	173	177	4
3	3	44	47	3
4	1,3	388	390	3
ZERO	All valves	1	1	0
	closed			

SITE ID	CERRO DE LA ESTRELLA		
MONITOR MANUFA	CTUREDAPI		
MONITOR SERIAL	448		
MONITOR MODEL	100		
AIR TEMPERATURE	NEAR MONITOR21.3		
SITE BAROMETRIC	PRESSURE576.8		
DATE FOR AUDIT	12-03-03		

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	391.6
2	2,3	179.6
3	3	49.9
4	1,3	393.1
ZERO	ALL VALVES	5.9
	CLOSED	

SITE ID	LAGUNILLA		
MONITOR MANUFAC	ГUREDAPI		
MONITOR SERIAL	237		
MONITOR MODEL	100		
AIR TEMPERATURE N	EAR MONITOR20		
SITE BAROMETRIC PR	RESSURE581.29		
DATE FOR AUDIT	12-04-03		

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	382.3
2	2,3	177.7
3	3	50.8
4	1,3	381.5
ZERO	ALL VALVES	9.1
	CLOSED	

SITE ID	AZCAPOTZALCO		
MONITOR MANU	JFACTUREDAPI		
MONITOR SERIA	L496_		
MONITOR MODE	L10)0	
AIR TEMPERATU	URE NEAR MONITOR	21.1	
SITE BAROMETR	LIC PRESSURE	581.9	
DATE FOR AUDI	Т11-27-03		

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	394.1
2	2,3	185.0
3	3	48.7
4	1,3	392.6
ZERO	ALL VALVES	3.1
	CLOSED	

SITE ID	TLALNEPANTLA		
MONITOR MANUFAC	ГUREDAPI		
MONITOR SERIAL	451		
MONITOR MODEL	100		
AIR TEMPERATURE N	EAR MONITOR 22.3		
SITE BAROMETRIC PF	RESSURE576.7		
DATE FOR AUDIT	11-27-03		

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	416.7
2	2,3	190.9
3	3	54.1
4	1,3	416.2
ZERO	ALL VALVES	7.4
	CLOSED	

SITE ID	ENEP ACATLAN		
MONITOR MANUFAC	CTUREDAPI		
MONITOR SERIAL	236		
MONITOR MODEL	100		
AIR TEMPERATURE	NEAR MONITOR16.6		
SITE BAROMETRIC P	PRESSURE579		
DATE FOR AUDIT	11-28-03		

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	402.4
2	2,3	178.7
3	3	42.0
4	1,3	405.8
ZERO	ALL VALVES	-4.8
	CLOSED	

SITE ID	XALOSTOC		
MONITOR MANUFAC	ГUREDAPI		
MONITOR SERIAL	497		
MONITOR MODEL	100		
AIR TEMPERATURE N	EAR MONITOR16.7		
SITE BAROMETRIC PF	RESSURE578.3		
DATE FOR AUDIT	12-02-03		

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	398.2
2	2,3	179.4
3	3	44.9
4	1,3	398.0
ZERO	ALL VALVES	-0.7
	CLOSED	

SITE ID	SAN AGUSTIN		
MONITOR MANUFACT	FUREDAPI		
MONITOR SERIAL	464		
MONITOR MODEL	100		
AIR TEMPERATURE N	EAR MONITOR20.7		
SITE BAROMETRIC PR	ESSURE576.79		
DATE FOR AUDIT	12-02-03		

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	415
2	2,3	192.2
3	3	53.1
4	1,3	422.2
ZERO	ALL VALVES	6.6
	CLOSED	

SITE ID	PEDREGAL		
MONITOR MANUFAC	ГUREDAPI		
MONITOR SERIAL	235		
MONITOR MODEL	100		
AIR TEMPERATURE N	EAR MONITOR22.4		
SITE BAROMETRIC PR	ESSURE572.3		
DATE FOR AUDIT	12-04-03		

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	402.2
2	2,3	182.5
3	3	50.5
4	1,3	406.2
ZERO	ALL VALVES	6.2
	CLOSED	

SITE ID	_VALLEJO
MONITOR MANUFAC	TUREDAPI
MONITOR SERIAL	462
MONITOR MODEL	100
AIR TEMPERATURE N	EAR MONITOR23
SITE BAROMETRIC PF	RESSURE580.54
DATE FOR AUDIT	12-01-03

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	373
2	2,3	172
3	3	47
4	1,3	371
ZERO	ALL VALVES	4
	CLOSED	

SITE ID	TAXQUEÑA
MONITOR MANUFACT	FUREDAPI
MONITOR SERIAL	252
MONITOR MODEL	100
AIR TEMPERATURE N	EAR MONITOR18.9
SITE BAROMETRIC PR	RESSURE579.8
DATE FOR AUDIT	12-04-03

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	380
2	2,3	172
3	3	45
4	1,3	382
ZERO	ALL VALVES	2
	CLOSED	

CARBON MONOXIDE PERFORMANCE AUDIT

SITE ID	CERRO DE LA ESTRELLA		
MONITOR MANUFAC	TUREDAPI		
MONITOR SERIAL	318		
MONITOR MODEL	300		
AIR TEMPERATURE N	NEAR MONITOR21.3		
SITE BAROMETRIC P	RESSURE576.8		
DATE FOR AUDIT	12-03-03		

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	42.0
2	2,3	18.8
3	3	4.6
4	1,3	42.0
ZERO	ALL VALVES	0.2
	CLOSED	

CARBON MONOXIDE PERFORMANCE AUDIT

SITE IDLAGUNILLA		
MONITOR MANUFAC	TUREDAPI	
MONITOR SERIAL	112	
MONITOR MODEL	300	
AIR TEMPERATURE N	NEAR MONITOR20.0	
SITE BAROMETRIC P	RESSURE581.29	
DATE FOR AUDIT	12-01-03	

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	43.4
2	2,3	20.1
3	3	5.3
4	1,3	43.2
ZERO	ALL VALVES	0.6
	CLOSED	

CARBON MONOXIDE PERFORMANCE AUDIT

SITE ID	AZCAPOTZALCO		
MONITOR MANUFAC	ГUREDAPI		
MONITOR SERIAL	309		
MONITOR MODEL	300		
AIR TEMPERATURE N	EAR MONITOR21.1		
SITE BAROMETRIC PF	RESSURE581.9		
DATE FOR AUDIT	11-27-03		

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	42.7
2	2,3	18.7
3	3	4.2
4	1,3	42.7
ZERO	ALL VALVES	-0.5
	CLOSED	

SITE ID	ENEP ACATLAN		
MONITOR MANUFAC	TUREDAPI		
MONITOR SERIAL	1161		
MONITOR MODEL	300		
AIR TEMPERATURE N	EAR MONITOR16.6		
SITE BAROMETRIC PI	RESSURE579.0		
DATE FOR AUDIT	11-28-03		

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	41.8
2	2,3	18.9
3	3	5.2
4	1,3	41.8
ZERO	ALL VALVES	0.1
	CLOSED	

SITE ID	_XALOSTOC
MONITOR MANUFACT	TUREDAPI
MONITOR SERIAL	308
MONITOR MODEL	300
AIR TEMPERATURE NI	EAR MONITOR16.7
SITE BAROMETRIC PR	ESSURE578.3
DATE FOR AUDIT	12-02-03

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	39.3
2	2,3	17.4
3	3	3.9
4	1,3	39.3
ZERO	ALL VALVES	-0.3
	CLOSED	

SITE ID	SAN AGUSTIN		
MONITOR MANUFACT	FUREDAPI		
MONITOR SERIAL	301		
MONITOR MODEL	300		
AIR TEMPERATURE N	EAR MONITOR20.7		
SITE BAROMETRIC PR	RESSURE576.79		
DATE FOR AUDIT	12-02-03		

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	44.5
2	2,3	20.1
3	3	4.9
4	1,3	44.4
ZERO	ALL VALVES	0.3
	CLOSED	

SITE ID	E IDPEDREGAL		
MONITOR MANUFACTURED API			
MONITOR SERIAL	1169		
MONITOR MODEL	300		
AIR TEMPERATURE	NEAR MONITOR22.4		
SITE BAROMETRIC F	PRESSURE572.3		
DATE FOR AUDIT	12-04-03		

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	42.0
2	2,3	18.8
3	3	4.4
4	1,3	41.7
ZERO	ALL VALVES	-1.0
	CLOSED	

SITE ID	VALLEJO
MONITOR MANUFACT	FUREDAPI
MONITOR SERIAL	307
MONITOR MODEL	300
AIR TEMPERATURE N	EAR MONITOR 23.0
SITE BAROMETRIC PR	RESSURE570.54
DATE FOR AUDIT	12-01-03

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	43.8
2	2,3	19.0
3	3	4.2
4	1,3	44.2
ZERO	ALL VALVES	-0.1
	CLOSED	

SITE ID	TAXQUEÑA		
MONITOR MANUFAC	TUREDAPI		
MONITOR SERIAL	1168		
MONITOR MODEL	300		
AIR TEMPERATURE N	EAR MONITOR18.9		
SITE BAROMETRIC PI	RESSURE579.8		
DATE FOR AUDIT	12-04-03		

POINT	VALVES OPEN	RESULTS IN PPB
1	1,3	41
2	2,3	18.2
3	3	4.7
4	1,3	41.0
ZERO	ALL VALVES	2-0.4
	CLOSED	

APPENDIX C

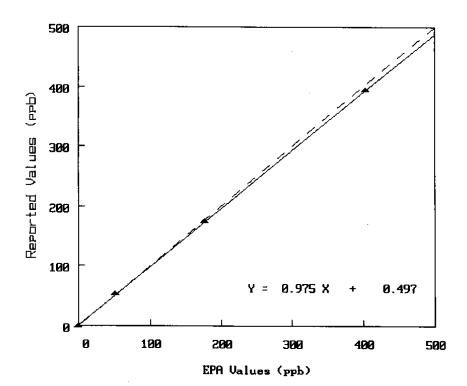
NPAP Individual Monitor Audit Results

01/05/2004

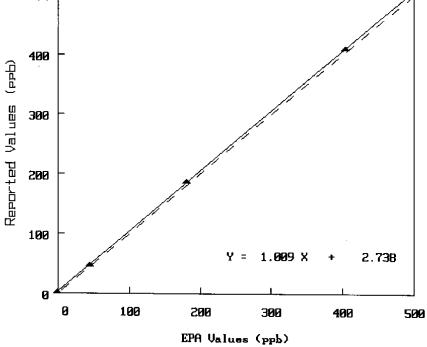
7ME031 0 7ME031 Mr Matthew Witosky Attache, US EPA-US Embassy Mexico City 225 Vermillion Road Brownsville, TX 78521

Actual values adjusted for site barometric pressure: 581.90 mm Hg

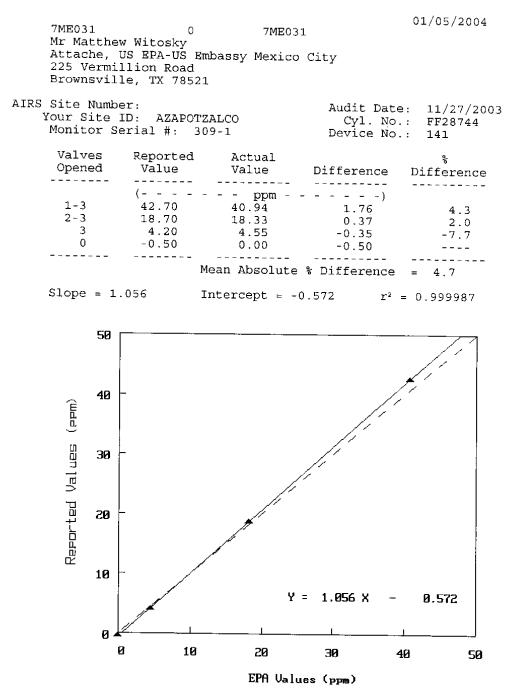
AIRS Site Num Monitor Seria Your Site ID:	l #: 793-1	Auc	Audit Dat dit Device No	
Pot.	Reported	Actual		*
Setting	Values	Values	Difference	Difference
	(- ppb)	
0	-0.8	0.3	-1.1	
485	394.5	404.6	-10.1	-2.5
350	174.1	177.8	-3.7	-2.1
255	53.2	52.4	0.8	1.5
Mean Absolute % Difference = 2.0 Slope = 0.975 Intercept = 0.497 r ² = 0.999944				

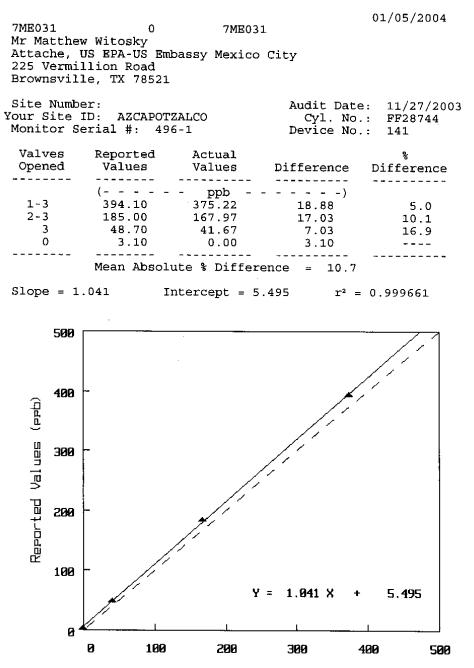


Attache, 225 Vermi	0 w Witosky US EPA-US Emba llion Road le, TX 78521	7ME03: ssy Mexico		01/05/2004
AIRS Site Monitor S Site ID:	Number: erial #: 793- AZCAPOTZALCO	1	Audit Date: NO Cyl. No.: Device No.:	FF28744
Valves Opened	Reported Values		Difference	<pre>% Difference</pre>
1-3 2-3 3 0	(410.80 187.90 47.10 2.50		5.64 6.52 2.10 2.50	1.4 3.6 4.7
NO Slope	Mean Absolut = 1.009 I			= 0.999937
500				



Results of Carbon Monoxide (CO) Audit



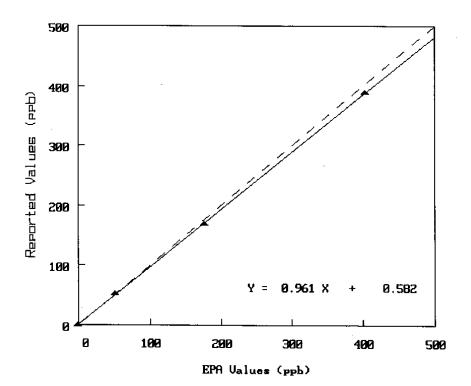


01/05/2004

7ME031 0 7ME031 Mr Matthew Witosky Attache, US EPA-US Embassy Mexico City 225 Vermillion Road Brownsville, TX 78521

Actual values adjusted for site barometric pressure: 581.29 mm Hg

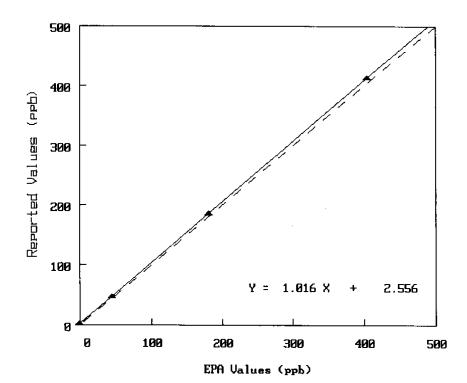
AIRS Site Numb Monitor Serial Your Site ID:	#: 443-1	Auc	Audit Dat dit Device No	,,
Pot. Setting	Reported Values	Actual Values	Difference	% Difference
	(ppb)	
0	0.4	0.3	0.1	
485	389.4	404.4	-15.0	-3.7
350	170.3	177.7	-7.4	-4.2
255	52.1	52.4	-0.3	-0.6
Mean Absolute % Difference = 2.8 Slope = 0.961 Intercept = 0.582 r ² = 0.999970				

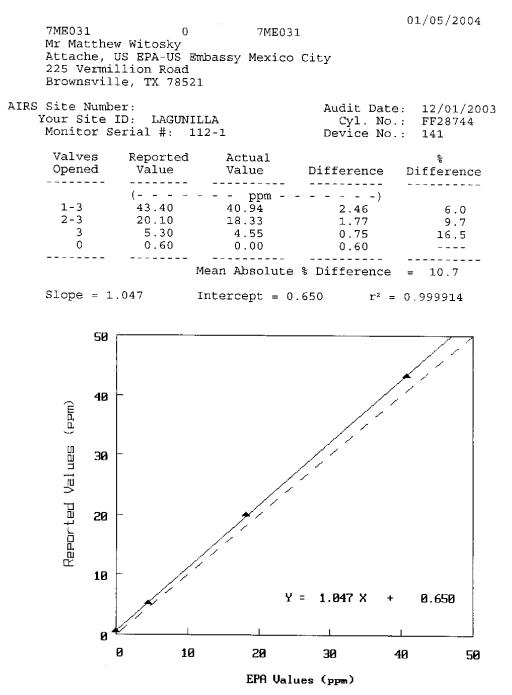


Results of NO2 Continuous Audit

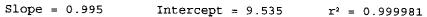
for 4th Quarter 2003

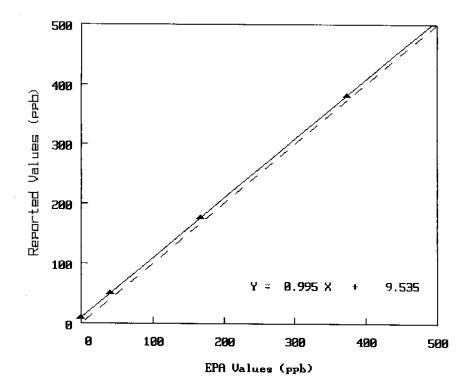
01/05/2004 7ME031 7ME031 0 Mr Matthew Witosky Attache, US EPA-US Embassy Mexico City 225 Vermillion Road Brownsville, TX 78521 AIRS Site Number: Audit Date: 12/01/2003 Monitor Serial #: 232-1 NO Cyl. No.: FF28744 Device No.: 141 Site ID: LAGUNILLA Valves Reported Actual 웋 Values Opened Values Difference Difference --------------------------- - - - -) (- - - - ppb -1-3 414.30 405.16 9.14 2.3 181.38 2-3 186.20 4.82 2.7 3 48.10 45.00 3.10 6.9 0 3.00 0.00 3.00 _ _ _ _ -------------------_ _ _ _ _ _ _ _ Mean Absolute % Difference = 3.9 NO Slope = 1.016Intercept = 2.556 r² = 0.999994





225 Vermi		7ME031 bassy Mexico	-	01/05/2004
	er: ID: LAGUNIL erial #: 23			: 12/04/2003 : FF28744 : 141
Valves Opened	Reported Values		Difference	ہ Difference
1-3 2-3 3 0	382.30	- ppb 375.22 167.97 41.67 0.00	7.08 9.73 9.13 9.10	1.9 5.8 21.9
~~~~~~~	Mean Absolu	ute % Differe	ence = 9.9	

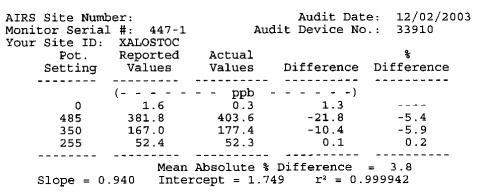


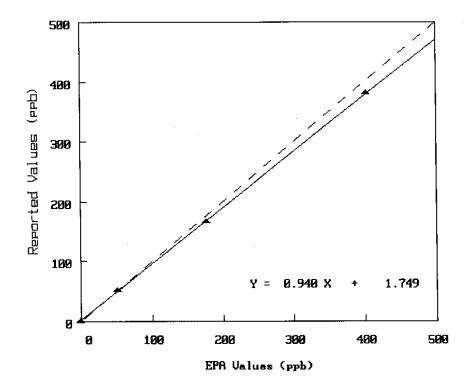


01/05/2004

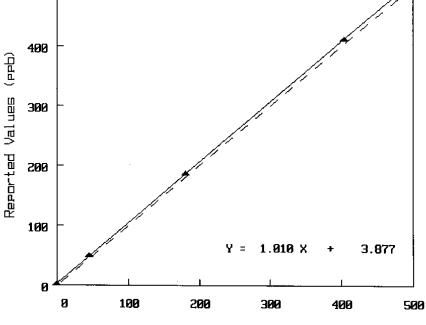
```
7ME031 0 7ME031
Mr Matthew Witosky
Attache, US EPA-US Embassy Mexico City
225 Vermillion Road
Brownsville, TX 78521
```

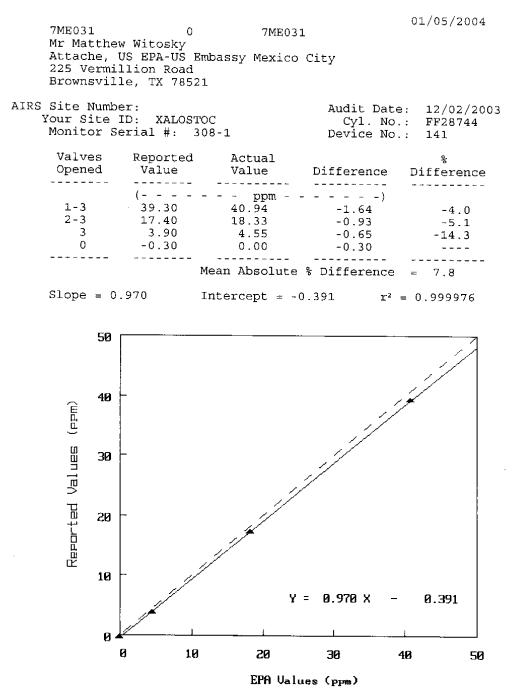
Actual values adjusted for site barometric pressure: 578.30 mm Hg



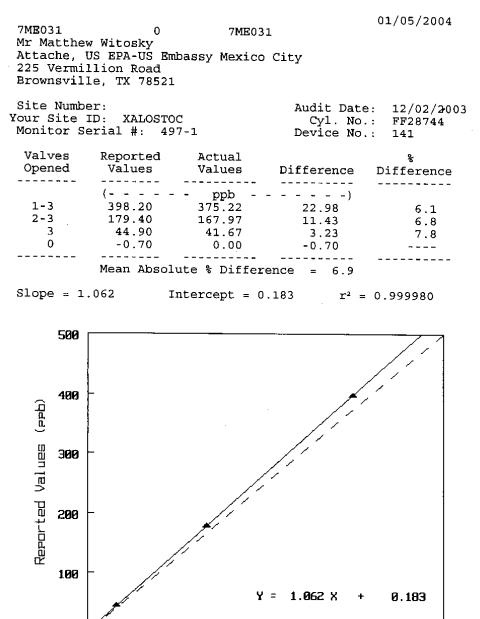


01/05/2004 7ME031 0 7ME031 Mr Matthew Witosky Attache, US EPA-US Embassy Mexico City 225 Vermillion Road Brownsville, TX 78521 AIRS Site Number: Audit Date: 12/02/2003 Monitor Serial #: 521-1 NO Cyl. No.: FF28744 Device No.: 141 Site ID: XALOSTOC Valves Reported Actual 왐 Opened Values Difference Values Difference --------------------------(- - - -- - - - -) ppb -412.80 7.64 1-3 405.16 1.9 2-3 187.40 181.38 6.02 3.3 3 50.20 45.00 5.20 11.6 0 2.90 0.00 2.90 _ _ _ _ - - - - - --------------------Mean Absolute % Difference = 5.6 NO Slope  $\approx$  1.010 Intercept = 3.877  $r^2 = 0.999981$ 500 400 300





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200

EPA Values (ppb)

300

400

500

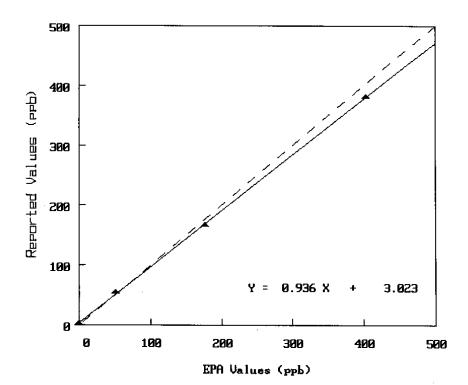
0 <u>2</u> 0 100

01/05/2004

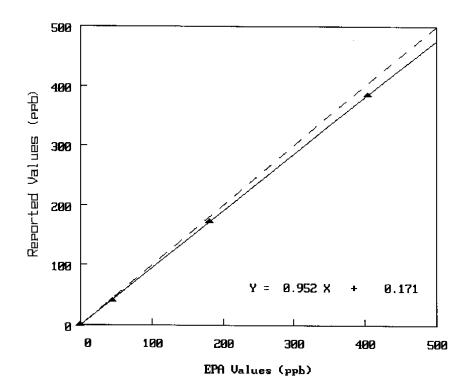
7ME031 0 7ME031 Mr Matthew Witosky Attache, US EPA-US Embassy Mexico City 225 Vermillion Road Brownsville, TX 78521

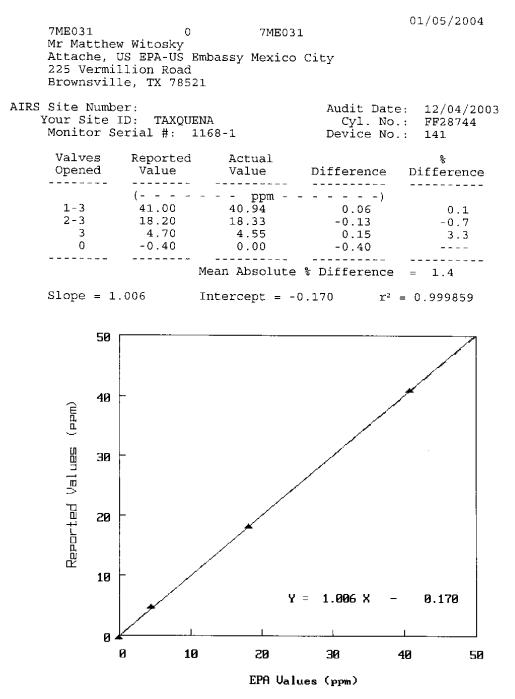
Actual values adjusted for site barometric pressure: 579.80 mm Hg

AIRS Site Numb Monitor Serial Your Site ID:	L #: 229-1	Au	Audit Dat dit Device No	,,-+++
	Reported	Actual		8
Setting	Values	Values	Difference	Difference
0	······································	ppb	~	
0	2.0	0.3	1.7	
485	382.0	404.0	-22.0	-5.5
350	167.0	177.6	-10.6	-5.9
255	55.0	52.4	2.6	5.0
	Mean A	Absolute %	Difference	= 5.5
Slope = 0	.936 Interd	cept = 3.0	$r^2 = 0.9$	999812



225 Vermi	0 W Witosky JS EPA-US Em llion Road le, TX 78521	-		01/05/2004
AIRS Site Monitor Se Site ID:	erial #: 52	5-2	Audit Date: NO Cyl. No.: Device No.:	FF28744
Valves Opened	Reported Values	Actual Values	Difference	۶ Difference
1-3 2-3 3 0	386.00 173.00 42.00 1.00	405.16 181.38 45.00 0.00		-4.7 -4.6 -6.7 
NO Slope	= 0.952	Intercept :	= 0.171 r ² =	= 0.999981





### Results of SO2 Continuous Audit

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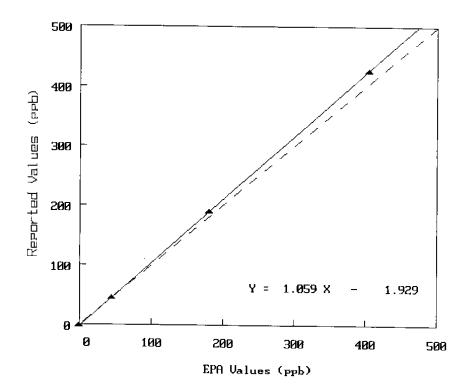
for 4th Quarter 2003

Attache, 225 Vermi	0 W Witosky US EPA-US llion Road le, TX 785	Embassy Mexic		01/05/2004
Site Numb Your Site Monitor S			Audit Date Cyl. No. Device No.	: FF28744
Valves Opened	Reported Values	Actual Values	Difference	ہ Difference
1-3 2-3 3 0	( 380.00 172.00 45.00 2.00	ppb - 375.22 167.97 41.67 0.00	4.78 4.03 3.33 2.00	1.3 2.4 8.0
Slope = 1		olute % Diffe Intercept =	erence = $3.9$ 2.605 $r^2 =$	0.999991
500				
(1400 (144)	-			
Reported Values (PPb) 002 006 006	-			
orted 	-		, ,	
на В 100			Y= 1.006 X +	2.605
0	0 19	 200		

11/07/2003 7ME031 0 7ME031 Mr Matthew Witosky Attache, US EPA-US Embassy Mexico City 225 Vermillion Road Brownsville, TX 78521 Actual values adjusted for site barometric pressure: 590.70 mm Hg AIRS Site Number: Audit Date: 11/03/2003 Monitor Serial #: 888 Audit Device No.: 33910 Your Site ID: MEXICO CITY LAB Pot. Reported Actual Ŷ Setting Values Values Difference Difference ----------------------------(- - - - ~ _ - ppb - - - ) 0 0.3 0.3 0.0 ----485 405.7 407.0 -1.3 -0.3 350 175.8 178.9 -3.1 -1.7 255 52.7 54.5 1.8 3.3 --------------------_ _ _ _ _ Mean Absolute % Difference = 1.8 Slope = 0.994Intercept = 0.283  $r^2 = 0.999906$ 500 400 Reported Values (ppb) 300 200 100 Y = 0.994 X + 0.283 Ø Ø 100 200 300 400 500 EPA Values (ppb)

### Results of NO2 Continuous Audit

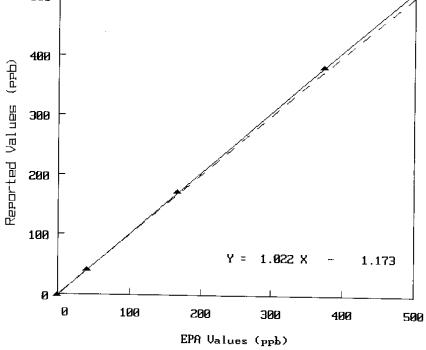
Attache, 225 Vermi	0 W Witosky US EPA-US En llion Road le, TX 78521	7ME0: nbassy Mexico		11/07/2003
AIRS Site Monitor S Site ID:	Number: erial #: 23 MEXICO CITY	56 LAB	Audit Date: NO Cyl. No.: Device No.:	FF28744
Valves Opened	Reported Values		Difference	ء Difference
1-3 2-3 3 0	427.10 190.10 45.70 -1.90	$\begin{array}{r} 405.16 \\ 181.38 \\ 45.00 \\ 0.00 \end{array}$	21.94 8.72 0.70 -1.90 rence = 3.9	5.4 4.8 1.6
NO Slope	= 1.059			= 1.000000



## Results of SO2 Continuous Audit

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Attache, 225 Vermi	0 W Witosky US EPA-US Emi llion Road le, TX 78521	7ME03 Dassy Mexico	_	11/07/2003
Site Numb Your Site Monitor S	er: ID: MEXICO ( erial #: 17(	CITY LAB	Audit Date Cyl. No. Device No.	: 11/03/2003 : FF28744 : 141
Valves Opened	Reported Values	Actual Values	Difference	% Difference
1-3 2-3 3 0	( 381.60 172.10 41.00 -1.70	- ppb - 375.22 167.97 41.67 0.00	) 6.38 4.13 -0.67 -1.70	1.7 2.5 -1.6
Slope = 1		te % Differ	ence = $1.9$ $1.173$ $r^2 =$	0.999960
500				



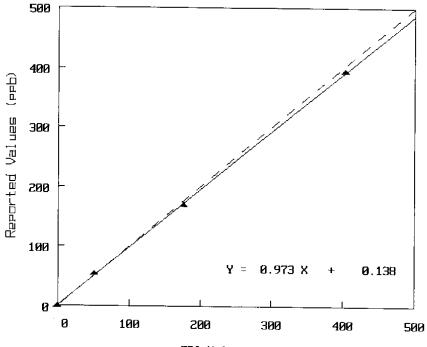
7ME031 0 7ME031 Mr Matthew Witosky Attache, US EPA-US Embassy Mexico City 225 Vermillion Road Brownsville, TX 78521

lco Citv

11/07/2003

Actual values adjusted for site barometric pressure: 580.00 mm Hg

AIRS Site Num Monitor Seria Your Site ID:		Aud	Audit Dat it Device No	
Pot. Setting	Reported Values	Actual Values	Difference	% Difference
			DILLETENCE	Difference
	(	- dqq -	)	
0	0.1	0.3	-0.2	
485	394.4	404.1	-9.7	-2.4
350	170.3	177.6	-7.3	-4.1
255	53.2	52.4	0.8	1.6
Slope = 0			Difference $r^2 = 0.9$	

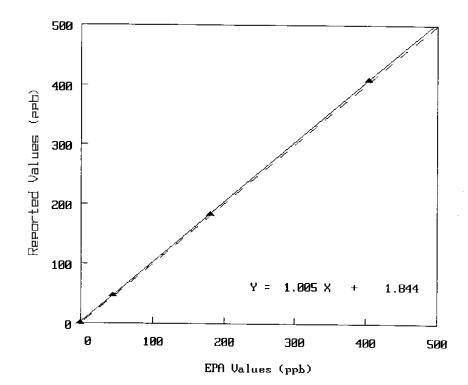


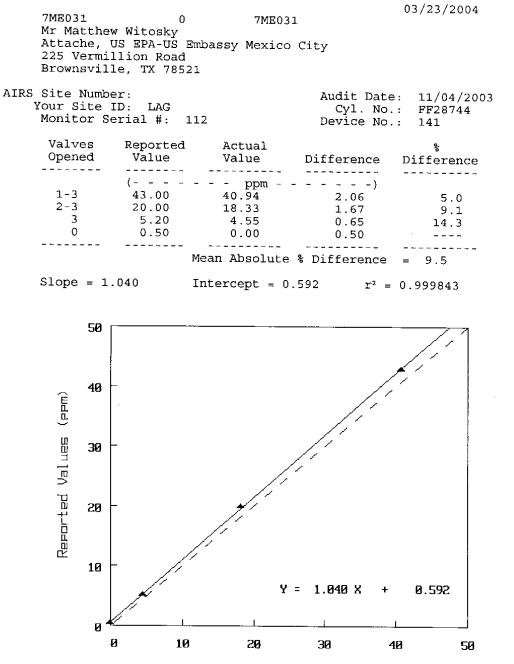
### Results of NO2 Continuous Audit

for 4th Quarter 2003

225 Vermil	IS EPA-US Emb	7ME0 Dassy Mexic		11/07/2003
AIRS Site Monitor Se Site ID:	rial #: 232	2	Audit Date: NO Cyl. No.: Device No.:	
Valves Opened	Reported Values	Actual Values	Difference	% Difference
1-3 2-3 3 0	( 409.10 183.90 47.60 1.50	405.16 181.38 45.00 0.00		1.0 1.4 5.8

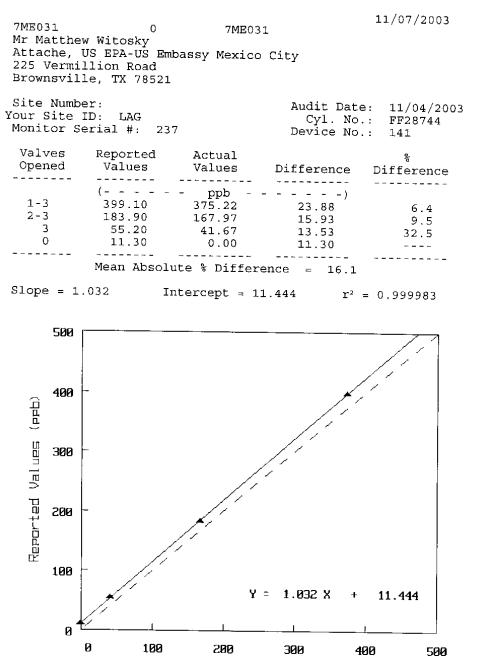
NO Slope = 1.005 Intercept = 1.844  $r^2 = 0.999995$ 





### Results of SO2 Continuous Audit

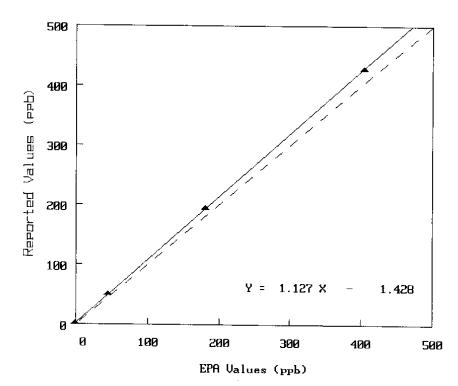
for 4th Quarter 2003

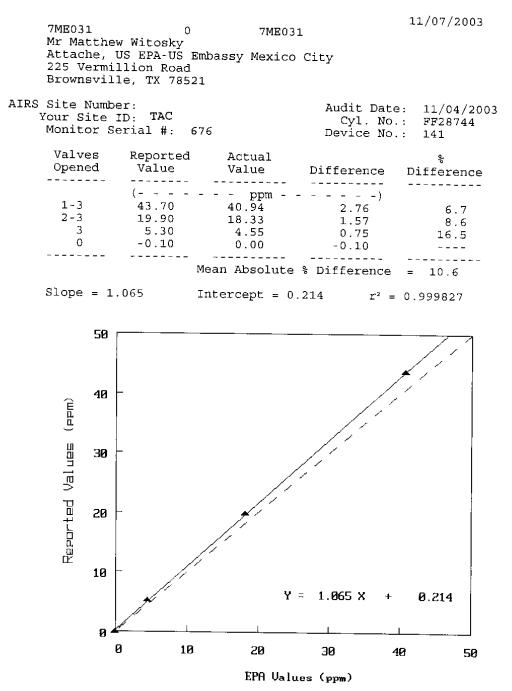


11/07/2003 7ME031 0 7ME031 Mr Matthew Witosky Attache, US EPA-US Embassy Mexico City 225 Vermillion Road Brownsville, TX 78521 Actual values adjusted for site barometric pressure: 581.00 mm Hg AIRS Site Number: Audit Date: 11/04/2003 Monitor Serial #: 442 Audit Device No.: 33910 Your Site ID: TAC Pot. Reported Actual 읗 Setting Values Values Difference Difference --------------------------( -- - - -- ppb - - -) 0 0.3 0.3 0.0 ----404.4 177.7 485 394.1 -10.3 -2.5 350 173.6 ~4.1 -2.3 255 53.3 52.4 0.9 1.7 - - - - - - - -- - **- - -** - --------------Mean Absolute % Difference = 2.2 Slope = 0.972Intercept = 1.050  $r^2 = 0.999970$ 500 400 Reported Values (ppb) 300 200 100 Y = 0.972 X + 1.050 Ø Ø 100 200 300 400 500

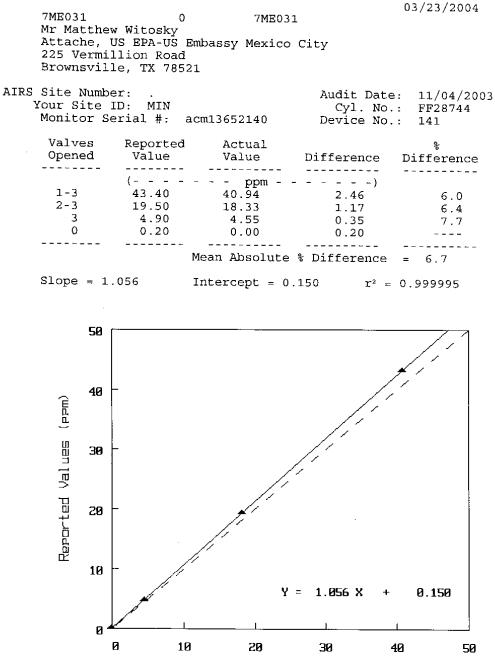
## Results of NO2 Continuous Audit

225 Vermil	IS EPA-US Eml	7ME03 bassy Mexico	-	11/07/2003
AIRS Site Monitor Se Site ID:	rial #: 220	6	Audit Date: NO Cyl. No.: Device No.:	FF28744
Valves Opened	Reported Values	Actual Values	Difference	۶ Difference
1-3 2-3 3 0	( 429.00 194.00 51.00 2.00	- ppb - 405.16 181.38 45.00 0.00	) 23.84 12.62 6.00 2.00	5.9 7.0 13.3
	Mean Absolu	ite % Differ	ence = 8.7	
NO Slope	= 1.052	Intercept =	2.855 r ² =	= 0.999987



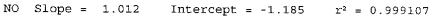


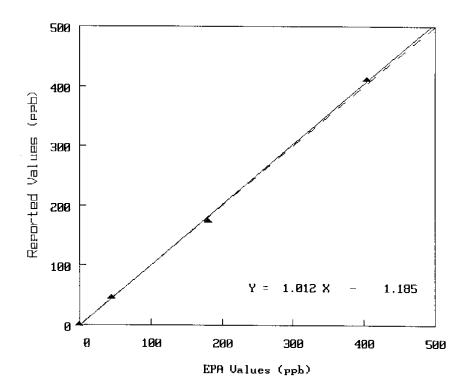
Attache, 225 Verm:	0 Ew Witosky US EPA-US Em illion Road lle, TX 78521	7ME031 bassy Mexico	L	11/07/2003
Site Number: Your Site ID: TAC Monitor Serial #: 501			Audit Date: Cyl. No.: Device No.:	FF28744
Valves Opened	Reported Values	Actual Values	Difference	* Difference
1-3 2-3 3 0	( 414.00) 191.00 54.00 6.00	- ppb 375.22 167.97 41.67 0.00	38.78 23.03 12.33 6.00	10.3 13.7 29.6
Mean Absolute % Difference=Slope = 1.085Intercept = 7.656 $r^2$ = 0.999942				
500				//1
Reported Values (PPD) 868 886	_			
	_			
ä ₽ 100		Су ¥ :	= 1.085 X +	7.656
0 1	0 100	 200	300 400	 500

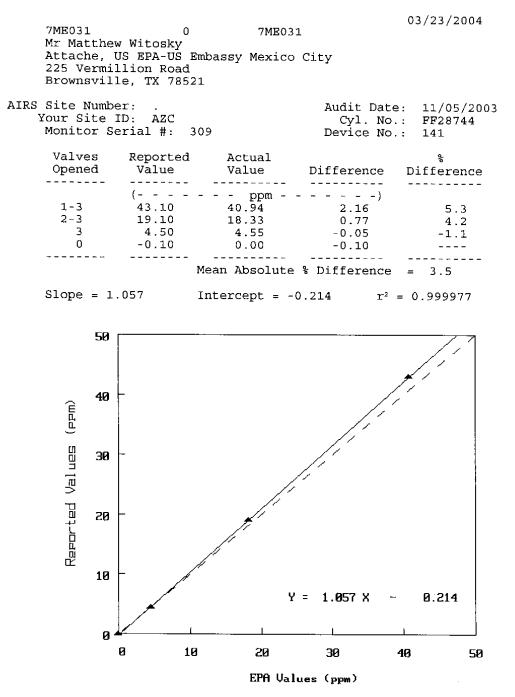


11/07/2003 7ME031 0 7ME031 Mr Matthew Witosky Attache, US EPA-US Embassy Mexico City 225 Vermillion Road Brownsville, TX 78521 Actual values adjusted for site barometric pressure: 574.60 mm Hg AIRS Site Number: Audit Date: 11/05/2003 Monitor Serial #: 793 Audit Device No.: 33910 Your Site ID: AZC Pot. Reported Actual 옹 Setting Values Values Difference Difference -----_ _ _ _ _ _ _ _ _ _____ ----(- - - - -- - -) ppb 0.7 0.4 0 0.3 ----485 394.8 402.6 -7.8 -1.9 350 166.8 176.9 -10.1 -5.7 255 51.5 52.2 -0.7 -1.3 --------------------------Mean Absolute % Difference = 3.0 Slope = 0.978Intercept = -1.104 r² = 0.999611 500 400 (dqq) Reported Values 300 200 100 Y = 0.978 X -1.104 Ø 0 100 200 300 400 500

7ME031 Mr Matthew Attache, U 225 Vermil Brownsville	11/07/2003			
AIRS Site D Monitor Ses Site ID: 2	rial #: 496	5	Audit Date: NO Cyl. No.: Device No.:	FF28744
Valves Opened	Reported Values	Actual Values	Difference	ء Difference
1-3 2-3 3 0	174.20 46.80 1.20	405.16 181.38 45.00 0.00	) 7.24 -7.18 1.80 1.20 rence = 3.2	1.8 -4.0 4.0







225 Vermil	0 V Witosky JS EPA-US Emi Llion Road Le, TX 78521	7ME03 Dassy Mexico		11/07/2003
Site Numbe Your Site J Monitor Se		5	Audit Date Cyl. No Device No	.: FF28744
Valves Opened	Reported Values	Actual Values	Difference	% Difference
1-3 2-3 3 0	( 410.40 176.10 51.90 5.60	- ppb - 375.22 167.97 41.67 0.00		9.4 4.8 24.6
Slope = 1. 500 (			rence = 12.9 3.899 r ² =	0.999056
(미리 (미리 (무리	-			
300 300	_	//		
Reported Values (ppb) 008 006	/,			
100	- /:			

Y = 1.074 X

300

3.899

500

+

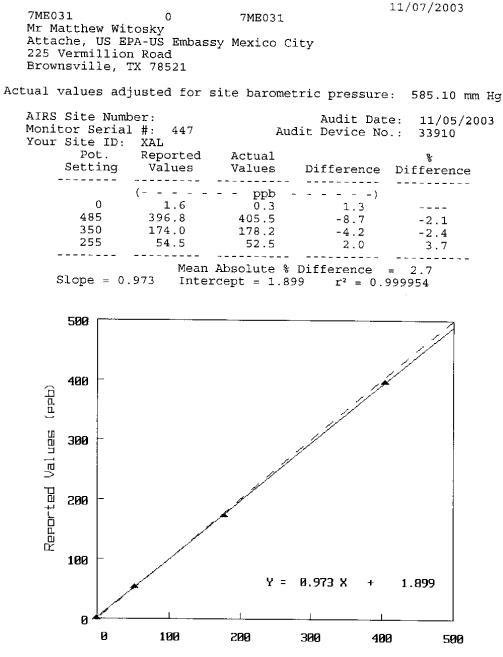
400

100

0 *****⁄

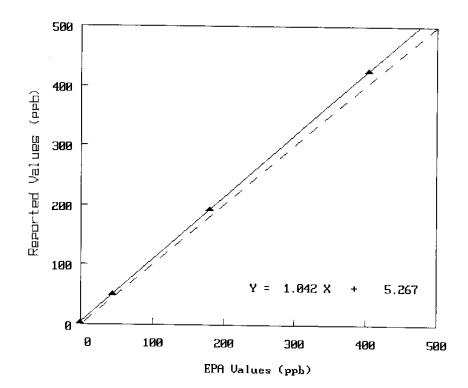
100

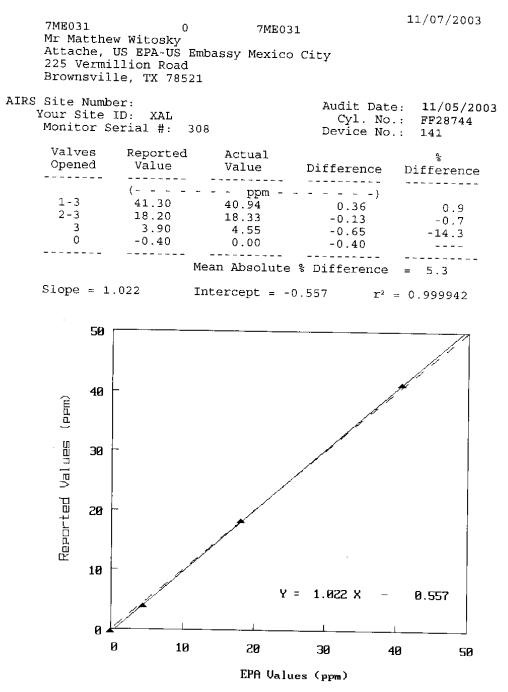
200



## Results of NO2 Continuous Audit

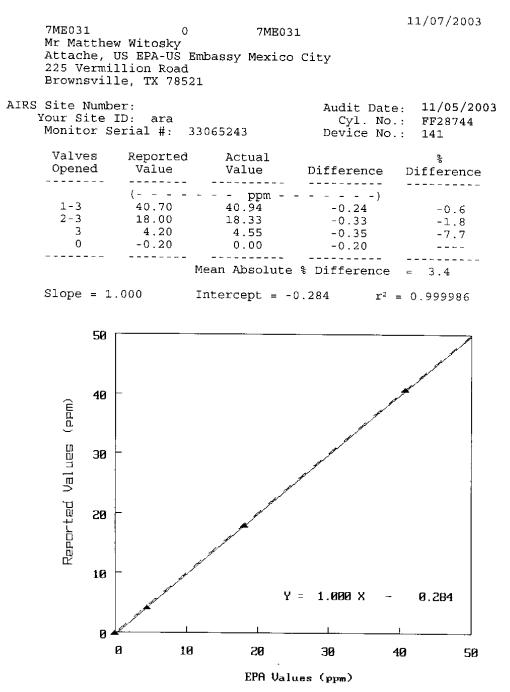
225 Vermil	IS EPA-US Em	7ME03 bassy Mexico		11/07/2003
AIRS Site Monitor Se Site ID:	rial #: 52	1	Audit Date: NO Cyl. No.: Device No.:	FF28744
Valves Opened	Reported Values	Actual Values	Difference	۶ Difference
1-3 2-3 3 0	425.60 193.88 51.00 3.80		20.44 12.50 6.00 3.80	5.0 6.9 13.3
NO Slope	= 1.041	Intercept =	4.217 r ² =	= 0.999990



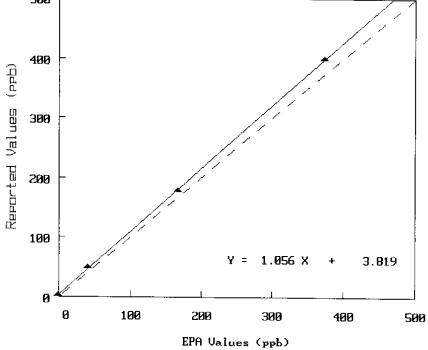


7ME031 Mr Matthe Attache, 225 Verm: Brownsvi	US EPA-U illion Ro	JS Embas bad	7ME03 sy Mexico		11/07/2003
Site Numl Your Site Monitor S	ID: XAI			Audit Dat Cyl. No Device No	D.: FF28744
Valves Opened	Report Value		Actual Values	Difference	% Difference
1-3 2-3 3 0	( 393.2 177.6 44.8 0.7	0 0 0	ppb - 375.22 167.97 41.67 0.00	) 17.98 9.63 3.13 0.70	4.8 5.7 7.5
Slope = 1			% Differ rcept = 1	ence = $6.0$ .173 $r^2$	= 0.999990
500		<u></u>			
(124 124 124	_				
Reported Values (PPD) 005 (Apd)	-				
arted 500	-	//			
≝ ₽ 100			Y	= 1.046 X -	+ 1.173
Ø	0	100	200	300	400 500

EPA Values (ppb)



225 Vermi	0 w Witosky US EPA-US Emb llion Road le, TX 78521	7ME03 Dassy Mexico	-	11/07/2003
Site Numb Your Site Monitor S				: 11/05/2003 : FF28744 : 141
Valves Opened	Reported Values	Actual Values	Difference	ء Difference
1-3 2-3 3 0	( 400.70 179.20 49.40 3.50	375.22	) 25.48 11.23 7.73 3.50	6.8 6.7 18.6
Slope = 1			ence = $10.7$ .819 $r^2 =$	0.999926
500				



 7ME031
 0
 7ME031

 Mr Matthew Witosky
 Attache, US EPA-US Embassy Mexico City

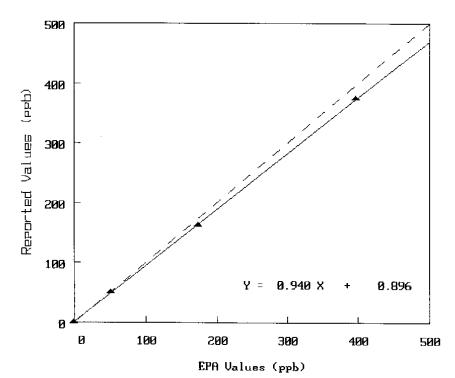
 Attache, US EPA-US Embassy Mexico City
 225 Vermillion Road

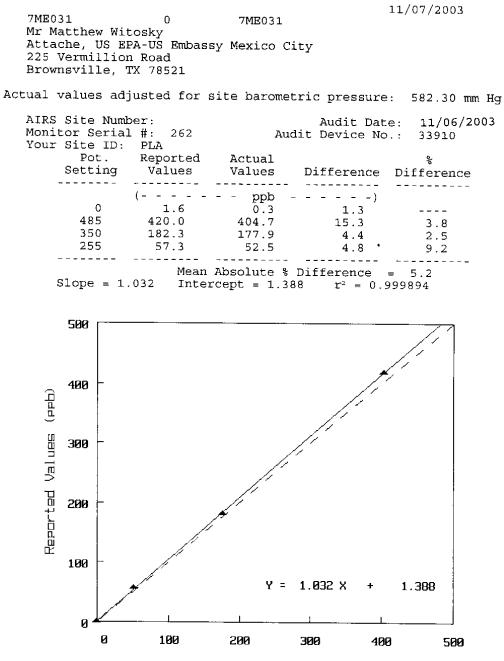
 Brownsville, TX 78521

 Actual values adjusted for site barometric pressure: 557.90 mm Hg

 AIRS Site Number:
 Audit Date: 11/06/2003

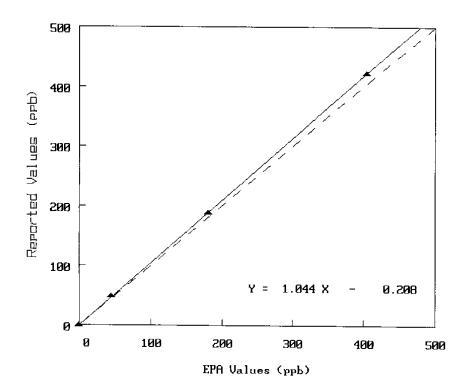
Monitor Seria	l #: 131	Au	dit Device No	.: 33910
Your Site ID:	CUA			
Pot.	Reported	Actual		010
Setting	Values	Values	Difference	Difference
<b></b>				
	(	ppb	)	
0	1.1	0.3	0.8	
485	375.9	398.1	-22.2	-5.6
350	162.7	175.0	-12.3	-7.0
255	51.1	51.6	-0.5	-1.0
	Mean	Absolute %	Difference	= 4.5
Slope = 0	.940 Inter	cept = 0.8	96 $r^2 = 0.2$	999873
-		-		

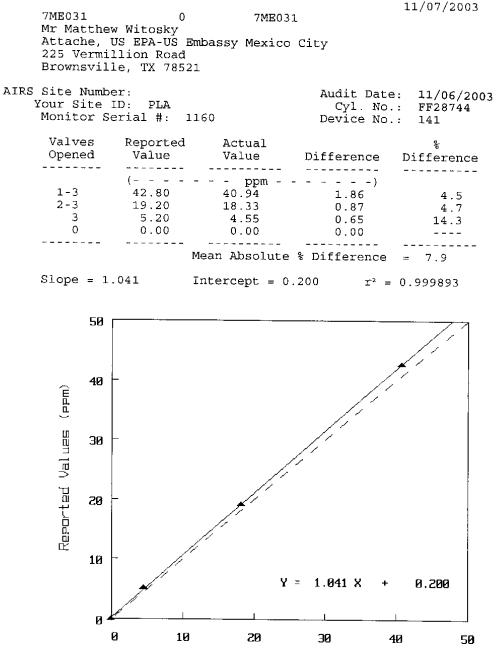




7ME031 0 7ME031 Mr Matthew Witosky Attache, US EPA-US Embassy Mexico City 225 Vermillion Road Brownsville, TX 78521					
AIRS Site Monitor Se Site ID:	rial #: 498	3	Audit Date: NO Cyl. No.: Device No.:	FF28744	
Valves Opened	Reported Values	Actual Values	Difference	% Difference	
	(				

NO Slope = 1.044 Intercept = -0.208  $r^2 = 0.999958$ 





225 Vermil	0 W Witosky JS EPA-US Emi llion Road Le, TX 78521	7ME0: Dassy Mexico		11/07/2003
Site Numbe Your Site J Monitor Se		D	Audit Date Cyl. No Device No	.: FF28744
Valves Opened	Reported Values	Actual Values	Difference	۶ Difference
1-3 2-3 3 0	( 402.90 185.20 52.20 3.40	- ppb - 375.22 167.97 41.67 0.00	) 27.68 17.23 10.53 3.40	7.4 10.3 25.3
Slope = 1. 500			rence = 14.3 5.933 r ² =	0.999866
(7 (7 d. d. d. d.	-			
200 Julian		/.		
Reported Values (PPb) 006 006				
ළු 100	- //			

0 *****~

100

200

EPA Values (ppb)

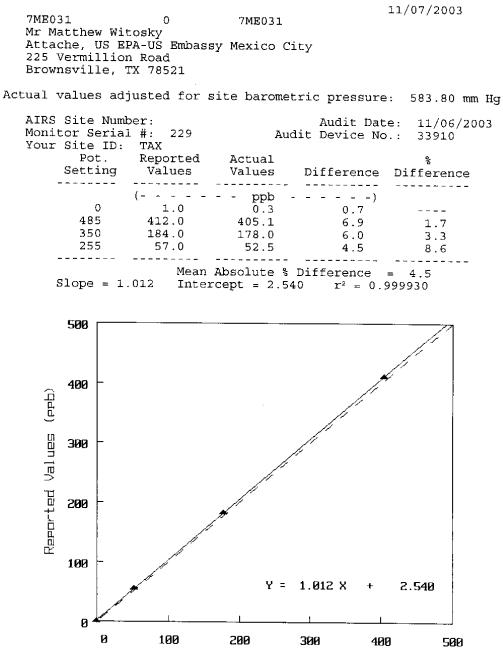
5.933

500

400

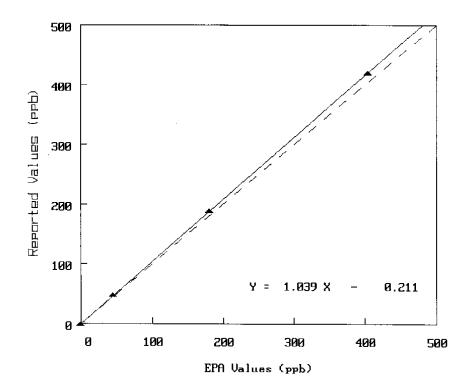
Y = 1.060 X +

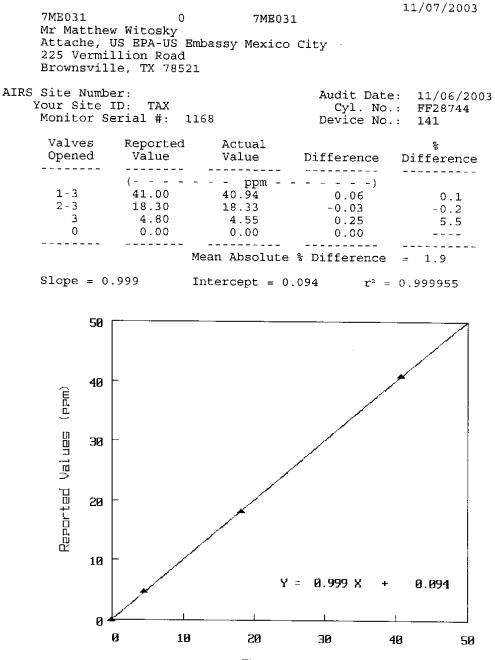
300



11/07/2003 7ME031 0 7ME031 Mr Matthew Witosky Attache, US EPA-US Embassy Mexico City 225 Vermillion Road Brownsville, TX 78521 Audit Date: 11/06/2003 NO Cyl. No.: FF28744 Device No.: 141 AIRS Site Number: Monitor Serial #: 525 Site ID: TAX Valves Reported Actual 웅 Values Opened Values Difference Difference ----------_ _ _ _ _ _ _ _ _ ------ - - - -) (- - - - ppb -1-3 420.00 405.16 14.84 3.7 7.62 2-3 189.00 181.38 4.2 3 48.00 45.00 3.00 6.7 0 -2.00 0.00 -2.00 ----- - -_ _ _ _ _ _ _ _ _ ------_____ _ _ _ _ _ _ _ Mean Absolute % Difference = 4.8

NO Slope = 1.039 Intercept = -0.211  $r^2 = 0.999940$ 





225 Vermil	JS EPA-US Emba	7ME03 assy Mexico	-	11/07/2003
Site Numbe Your Site I Monitor Se			Audit Date Cyl. No Device No	e: 11/06/2003 .: FF28744 .: 141
Valves Opened	Reported Values	Actual Values	Difference	% Difference
1-3 2-3 3 0	(	- ppb - 375.22 167.97 41.67 0.00	21.78 13.03 5.33 3.00	5.8 7.8 12.8
Slope = 1. 500 [			ence = 8.8 .450 r ² =	0.999981
400 (11 11 11 11 11 11 11 11 11 11 11 11 11	-			
Values 006	_	/,		



200

Y = 1.050 X

300

3.450

500

+

400

Reported

200

100

0 ***** 0

100