

# Restructuring EPA's Stationary Source Audit Program (SSAP)

Allowing Private Providers to Supply Audit Samples

## Why Did We Have an Audit Program?

- Audit samples provide assurance that testing performance was within acceptable limits during the compliance test
- Many of the test methods in Part 60 (NSPS) require testers to measure an audit sample during a compliance test
- There is a general requirement in Part 63 (NESHAPS/MACT) to analyze an audit sample during a compliance test

## How Did the SSAP Work?

- Audit samples were ordered by registered users through the SSAP database
- Samples were shipped to the user or to an address specified by the user
- The tester performing the compliance test measured the audit sample according to the enclosed directions and reports the results to the user

## How Did the SSAP Work?

- The user reported the result to the database and got immediate pass/fail results
- Users have access to historical results stored in the database

## Why Did EPA Restructure the SSAP?

- To ensure the long term stability of the program
- To allow the program to grow
  - By increasing the methods for which samples are available
  - By increasing the types of samples that are available – gases instead of liquid ampoules

## How Did EPA Restructure the Program?

- Allow private providers to supply audit samples directly to the regulated sources
- Require sources to buy the audit samples

## How Did EPA Change Its Rules to Allow Private Sample Providers?

- Amend the General Provisions of Parts 51, 60, 61, and 63 to state that audit samples will be available from private providers and not from EPA
- Require sample providers to develop standard operating procedures through a consensus process
- Require that sample providers be accredited by an independent accrediting body

## EPA Audit Rule Requirements

- Sources required to purchase audit samples if commercially available
- “Commercially Available” means that two or more independent Accredited Audit Sample Providers (AASPs) have audit samples available for purchase
- Methods exempt from Audit samples: 3A, 3C, 7E, 6C, 7E, 9, 10, 18, 19, 20, 22, 25a, 303, 318, 321

# EPA Audit Rule Requirements (cont)

- One audit sample is required for each method used during a compliance test
- Provide the opportunity for the compliance authority to comment on the selected concentration level for the audit
- Source reports results to AASP
- Pass/fail results reported to Regulatory Agency and Source at same time

## EPA Audit Rule Requirements (cont)

- The acceptance limit shall be set so that there is a 95 percent confidence that 90 percent of well qualified labs will produce results within the acceptance range

# Where Does the Audit Program Stand Now?

- Rule was promulgated September 13, 2010
- Waiting for Voluntary Consensus Standard Body to submit criteria documents for us to review for approval.