



TNI Stationary Source Audit Sample Program

December 8, 2010

Stanley Tong – EPA Region IX

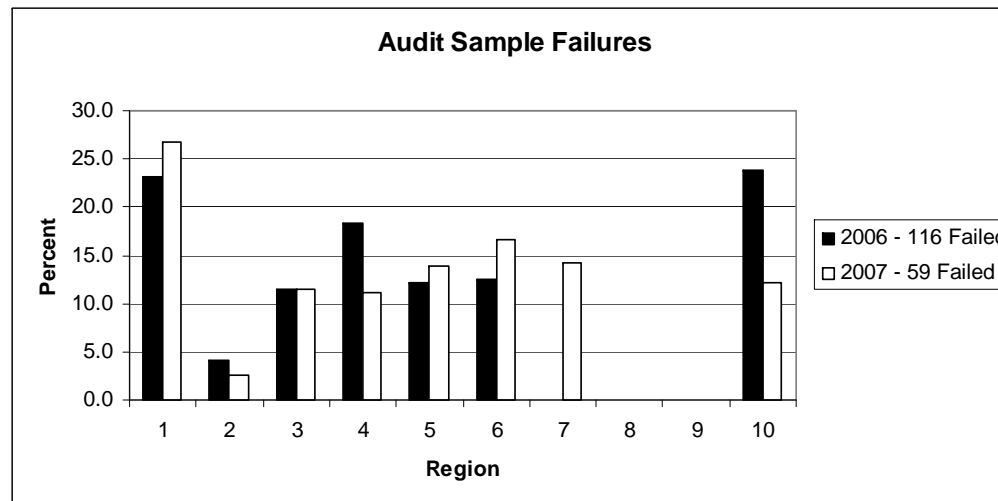
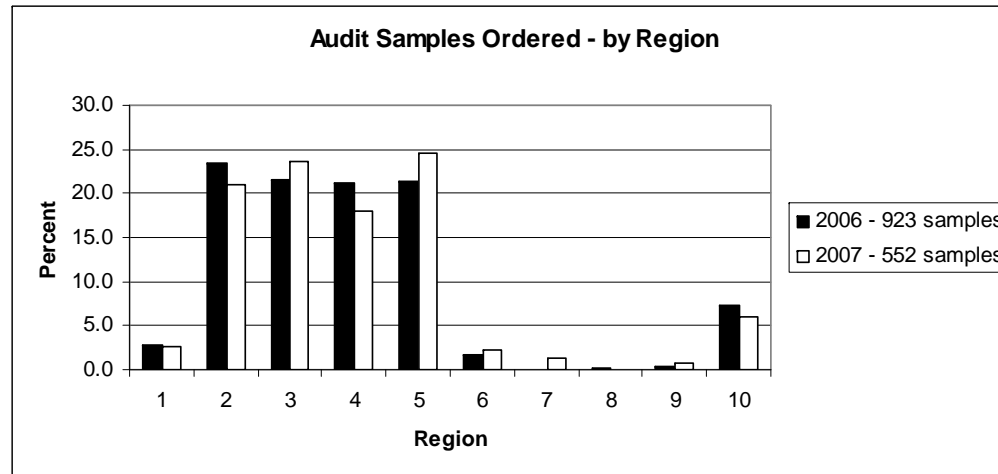
Gregg O'Neal – North Carolina DENR



Restructuring of Audit Sample Program

- Final rule published 9/13/10 (75 FR 55636)
- Audit samples now required for any compliance test citing EPA methods in 40 CFR 51, 60, 61, or 63 (e.g., see 40 CFR 60.8(g))
 - Gaseous audit samples ...must be collected by the sampling system during the compliance test... just as the compliance samples are collected. If a liquid or solid audit sample is designed to audit the sampling system, it must also be collected by the sampling system during the compliance test.

Importance of Audit Samples Failure Rate (2006-2007)





Privatized Audit Sample Program

- TNI Stationary Source Audit Sample (SSAS) Expert Committee
- 7/7/2008 - 1st meeting
- 10/9/2009 - 3 Standards developed
- Currently updating standards to conform with final EPA rule
- Refining SSAS Central Database



TNI Stationary Source Audit Sample Expert Committee

- Committee Members:

- Friedman, Maria (Chair)
- Hayes, Michael
- **Herbert, Jack**
- **Klein, Michael**
- Merrill, Ray
- **O'Neal, Gregg**
- Serne, Jim
- **Swartz, Richard (Vice-Chair)**
- Tong, Stanley
- TestAmerica (lab)
- Linde Group (potential audit sample provider)
- **Oregon DEQ**
- **New Jersey DEP**
- ERG (past EPA audit sample provider)
- **North Carolina DAQ**
- TRC (stack tester)
- **Missouri, DNR**
- EPA, R9

- Active Associate Members:

- Kassner, Shawn
- Miller, Michael
- Garber, Ty
- ERA (potential audit sample provider)
- Independent consultant
- Wibby Environmental (potential audit sample provider)

- Program Administrator

- Wilson, Jane
- NSF



SSAS Standards (“modules”)

- Three Modules
 - 1- Audit Sample Providers
 - 2- Audit Sample Provider Accreditors
 - 3- Participants
- SSAS FAQ Document
- SSAS homepage on the TNI website
<http://www.nelac-institute.org/ssas/>



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Stationary Source Audit Sample Program

[Program Information](#)

 [Frequently Asked Questions](#) (updated 4-5-2010, PDF, 153KB)

[Audit Sample Table](#)

 [Stationary Source Air Sampling \(SSAS\) Table](#)
Effective Date: July 1, 2009 (PDF, 72KB)

 [Stationary Source Air Sampling \(SSAS\) Table](#)
Effective Date: July 1, 2009 (XLS, 41KB)

[Final Standards](#)

 [General Requirements For Stationary Source Audit Sample Providers](#)
Volume 1, Module 1 (PDF, 62KB)

 [General Requirements For An Accreditor Of Stationary Source Audit](#)
Sample Providers Volume 1, Module 2 (PDF, 54KB)

 [Requirements For Participation In The TNI Stationary Source Audit](#)
Sample Program Volume 1, Module 3 (PDF, 75KB)

[Central Database](#)

Coming soon



Module 1: Accredited Audit Sample Provider

- Audit samples – equivalent challenge to all
- Meets SSAS Table-analytes/concentrations
- Verify assigned values
- Homogeneity testing
- Stability testing



Module 1: Accredited Audit Sample Provider (cont.)

- Receives order from facility
- ***Contacts regulator*** – any changes needed on facility's order? (e.g., chg conc. /shipment address)
- Ship within 15 calendar days if no response
- Notify regulator w/i 2 business days if facility cancels or modifies audit sample
- Shall not send the same audit sample twice to the same facility/laboratory



Module 1: Audit Sample Provider

Module 2: Accreditor

- Provide report w/i 3 business days to facility/regulator/tester/SSAS database
 - Assigned value
 - Acceptance limit
 - Laboratory value
- Module 2 – Accreditor



Module 3 – Participants (overview)

- Module 3 – Participants
- Specific role of the regulator
 - Facility or their representative ***contacts*** ***Regulatory Agency*** with “pre-test info”:
 - Sufficient documentation to calculate each audit sample concentration range needed including:



Module 3 – Participants (cont.)

- Test Methods
- Analytes
- Matrix or collection media, as appropriate
- Emission limits
- Estimated (or permitted) stack flow rates
- In-stack concentration estimates
- Proposed or estimated stack gas sample volume



Module 3 – Participants (cont.)

- Facility contacts Audit Sample Provider
 - Orders audit sample
 - Gives Audit Sample Provider info on:
 - ***Regulatory Agency staff contact info***
 - Stack Tester contact info
 - Laboratory contact info



Module 3 – Participants (cont.)

- ***Regulatory Agency responsibilities:***
 - Review pre-test info from facility (e.g., test protocol or other)
 - Review facility's audit sample request;
 - Accept or modify audit sample request within 15 days of notification from audit sample provider
 - Review audit sample/stack test results



Module 3 – Participants (cont.)

- Stack Tester responsibilities:
 - Coordinate with facility/lab/regulatory agency
 - Receive audit sample(s)/have available during testing
 - Deliver stack test and audit sample(s) to lab at the same time
 - Include audit sample results in test report



Module 3 – Participants (cont.)

- Laboratory responsibilities
 - Use same personnel and equipment to analyze stack test/audit sample(s)
 - Report audit sample results to audit sample provider and regulatory agency
 - Keep records of audit sample analysis for a minimum of 5 years, or as directed by the regulatory agency

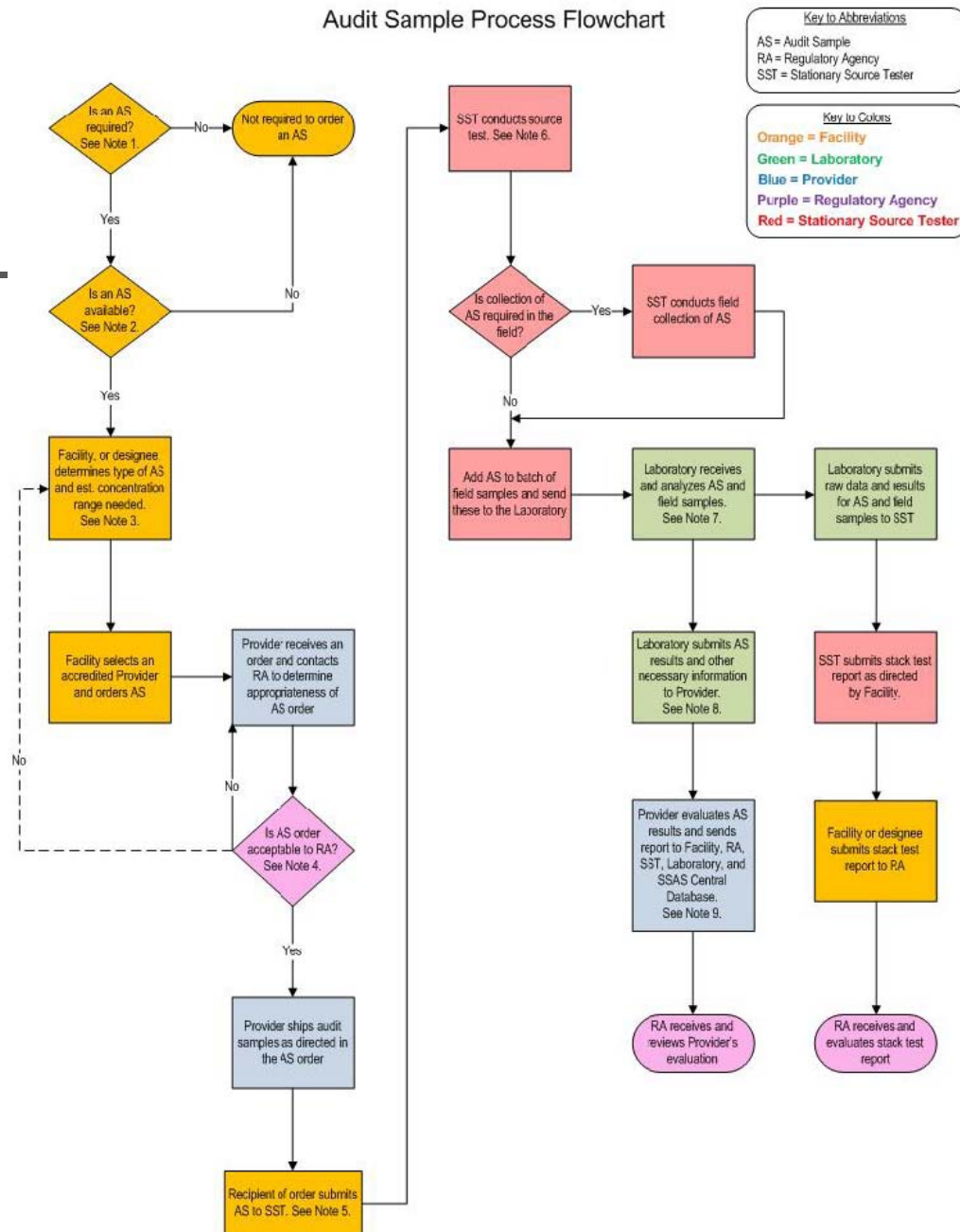


Regulatory Agency Responsibilities – (summary)

- Point of Contact for Audit Sample Provider
- Concur with analyte/concentration
 - Concur within 15 days
 - Lowest concentration; permit limit; or stack concentration?
 - EMC guidance on choosing an appropriate concentration for an audit sample
- Review stack test/audit sample results

Attachment 1

Audit Sample Process Flowchart





What's left?

- TNI - Finish review of analyte list and acceptance limits
- Submit TNI program to EPA for approval
- **States - signup to access TNI central database**
- **States – Establish point of contact for audit sample providers**
- Accreditation of audit sample providers



What's left? (cont.)

- Audit samples commercially available
 - 2 providers (minimum)
 - at least 60 days before test www.epa.gov/ttn/emc
- Inform testers/facilities of new requirement



States already signed up for database access (in yellow)

Alabama	Hawaii	Massachusetts	New Mexico	South Dakota
Alaska	Idaho	Michigan	New York	Tennessee
Arizona	Illinois	Minnesota	North Carolina	Texas
Arkansas	Indiana	Mississippi	North Dakota	Utah
California	Iowa	Missouri	Ohio	Vermont
Colorado	Kansas	Montana	Oklahoma	Virginia
Connecticut	Kentucky	Nebraska	Oregon	Washington
Delaware	Louisiana	Nevada	Pennsylvania	West Virginia
Florida	Maine	New Hampshire	Rhode Island	Wisconsin
Georgia	Maryland	New Jersey	South Carolina	Wyoming



Dear Sir or Madam:

As you know, the USEPA has taken steps to privatize the Stationary Source Audit Program (74 FR 28451, June 16, 2009). The final rule was published on September 13, 2010. The NELAC Institute (TNI) will be applying to participate in the privatized program as a Voluntary Consensus Standards Body.

Accordingly, TNI has adopted standards for a TNI Stationary Source Audit Sample (SSAS) Program, and is engaged in activities to prepare to support its program. An important component of TNI's SSAS Program will be a Central Database: a secure online repository of audit sample results. To this end, TNI is now soliciting contact information for technical contacts for your Agency. This should be individuals with technical knowledge of and involvement with EPA's audit sample program, to be responsible for communicating with Stationary Source Testers, Facilities, Laboratories, and audit sample Providers.

The information you provide will be used to establish credentials for access to the TNI SSAS Central Database website, now under development. In addition, TNI's SSAS Program, when implemented, will provide for consultation between audit sample Providers and Regulatory Agencies regarding audit sample concentrations prior to shipment; the individual(s) you designate will be the audit sample Provider's first point of contact at your agency for this important function.

Contact information may be sent to TNI using an online form available at the following address: <http://nelac-institute.org/ssas/regaccount.php>. Please fill out the online form for each technical contact in your Agency, as appropriate.

For questions regarding the TNI SSAS Central Database, please contact Gregg O'Neal at gregg.oneal@ncdenr.gov. Additional information about TNI and the TNI SSAS Program is available at <http://nelac-institute.org>.

On behalf of the TNI SSAS Expert Committee, thank you for your participation.

Sincerely,

Maria Friedman
Chair
TNI SSAS Expert Committee



FAQs

What audit samples are available for purchase and who are the accredited Providers?

Does TNI's involvement in the Stationary Source Audit Sample Program mean that Laboratories need to be NELAC accredited to participate?

How far in advance to order audit samples?

If multiple sources at a single Facility are tested during a compliance test event, can a Regulatory Agency require more than one audit sample for each method used during a compliance test?

Draft EMC guidance on choosing an appropriate concentration for an audit sample



Comments – Questions?

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