

Frequently Asked Questions for the SSAP Rule

1. When will audit samples become available?

There is no set date. Before audit samples can become commercially available, a Voluntary Consensus Standard Body (VCSB) must submit their standard documents for how they will operate an audit program, and EPA will then review and approve or disapprove the documents based on a comparison of the documents to the minimum standards outline in the rule. If EPA approves a particular program, then the VCSB will hire an independent third party to be the accrediting body, who will then determine if the audit sample provider can provide samples in accordance with the VCSB documents, and that they operate in accordance with those documents. After the audit sample provider is accredited, they can then start producing samples.

2. Can I use a proficiency test (PT) sample instead of an audit sample if audit samples are not available from Accredited Audit sample providers?

No, PT samples cannot be used instead of audit samples because the PT samples may not be made using the same protocols set forth in the standards defined by the VCSB, and this could bring into question the validity of the data.

3. How do I find out if an audit sample is available?

We will provide a list of the available audit samples on our website along with a list of accredited audit sample providers (AASPs). The list will be updated as new information becomes available.

4. How far in advance do I need to order a sample?

That will need to be worked out between the requester, the AASP, and the regulatory agency. The rule does not specify any timeframe.

5. Who should I contact at EPA concerning the Restructuring of the Stationary Source Audit Program rule?

The contact is Candace Sorrell. Her phone number is 919-541-1064 and her e-mail address is sorrell.candace@epa.gov

6. Who is responsible for obtaining an audit sample?

The source owner, operator or representative of the tested facility is responsible for obtaining an audit sample.

7. Do laboratories have to be accredited to analyze audit samples?

The rule does not require laboratories to be accredited to analyze the audit samples; however, individual regulatory authorities may require testing firms and laboratories to be accredited to conduct testing in their jurisdiction. You will need to check with the regulatory authority to determine their requirements.

8. How many audit samples are required for a given performance test?

Only one audit sample per method used during a performance test is required by the rule. However, a state or local regulatory authority can require more than one audit sample if they think it is useful or necessary. If a state places requirements in state rules and/or SIPs that multiple audit samples are required under certain conditions, then that is the law for those sources in that state.

9. Do regulatory authorities need the Administrator's approval to waive the audit requirement for a particular test?

No, the rule states that the regulatory authority may waive the requirement to include an audit sample if they believe that an audit is not necessary.

10. What sources are required to use audits?

Any source that is required to conduct compliance testing using an EPA test method found in Parts 51, 60, 61 or 63 is required to use audit samples if they are available. The rule does exempt several methods which already have sufficient calibration and quality assurance requirements or determine visible emissions by observation and therefore, there is no practical way to audit them. Those

methods are Methods 3C, 6C, 7E, 9, 10, 18, 20, 25A, 303, 318, 320, and 321.

11. Why was Method 3A not exempt from needing an audit sample?

Method 3A was accidentally left off the list of exempt methods in the rule and should not be required to use an audit sample. EPA will correct this error in the next method update package.

12. Are audit samples only required for federal regulations?

No, audits are required for any compliance test which uses an EPA test method found in Parts 51, 60, 61, and 63 for which an audit is available. The compliance test can be for a federal regulation, SIP, etc.

13. Are audit samples applicable for the modified Method 26A required in Part 63, Subpart S, "National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry."

In this particular situation the Method 26A audits are not appropriate to use because of the modifications made to the analysis portion of the method which are outlined in the regulation.