



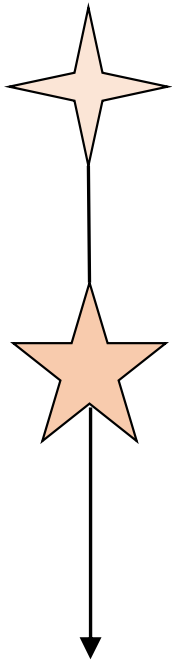
Stationary Source Audit Sample Program: From There to Here.

Sheri Heldstab, Chair, TNI SSAS Expert Committee
August 4, 2020



History of EPA's

Stationary Source Audit Program



1970

Clean Air Act enacted and incorporated into the United States Code as Title 42, Chapter 85. Significantly amended in 1977 and 1990.

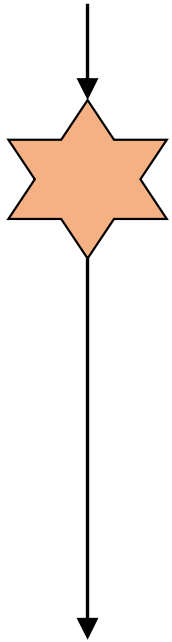
1984

First appearance of “audit sample” in a CFR method: 40 CFR 60 amended to require audit samples for Methods 6 (SO₂), 7, and 7A (NO_x) (each method states 2 Audits must be analyzed).

Audit samples provided by EPA.



History (continued)



2009
to
2011

EPA restructures Stationary Source Audit Program - requires Audit Samples to be obtained from Accredited Audit Sample Providers, if “commercially available”, instead of from EPA.

EPA approved TNI SSAS Expert Committee as a Voluntary Consensus Standards Body (VCSB) meeting the requirements of 40 CFR 60.8 and 40 CFR 63.7.

(Note: other bodies could meet the requirements. At this time the TNI SSAS Expert Committee is the only VCSB approved by the EPA.)





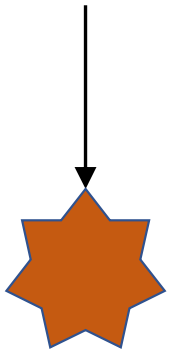
BOOM

Second Accredited Audit Sample Provider
dropped out of Program
May 2019





History (continued)



2019

Mandatory Stationary Source Audit Sample Program suspended due to lack of two Accredited Audit Sample Providers.





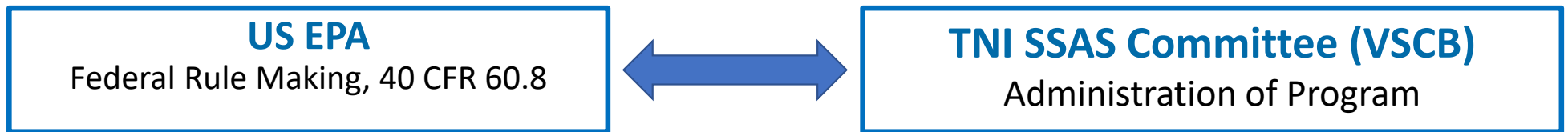
TNI SSAS Committee Survey

1. Answers indicated lack of understanding of Program Organization.





Stationary Source Audit Program (SSAP) Organizational Chart



SSAP Organizational Chart

US EPA: Federal Rule Making, 40 CFR 60.8

Sets minimum technical requirements for an approvable Audit Sample program.

Requires Audit Samples if one is “commercially available”.





SSAP Organizational Chart

US EPA: Federal Rule Making, 40 CFR 60.8



Defines “commercially available”.

“Commercially available means that two or more independent AASPs [Accredited Audit Sample Providers] have blind audit samples available for purchase.”

40 CFR 60.8 (g)(1), 7-1-19 Edition.





SSAP Organizational Chart

US EPA: Federal Rule Making, 40 CFR 60.8



Provides operating criteria for a “Voluntary Consensus Standard Body” (VCSB).

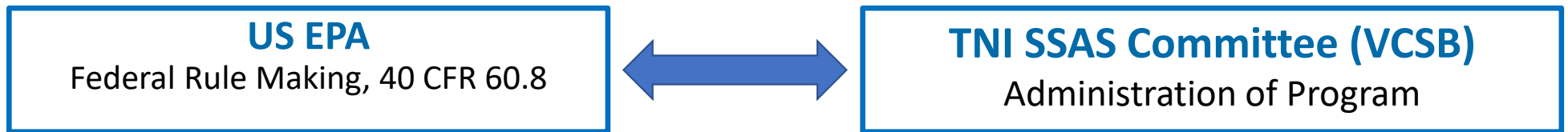
“The VCSB shall operate in accordance with the procedures and requirements in the Office of Management and Budget Circular A–119, (Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities),” 40 CFR 60.8(g)(4).

Circular A-119 defines a Voluntary Consensus Standards Body as having the following attributes: “(i) openness; (ii) balance of interest; (iii) due process; (iv) an appeals process; and (v) consensus...”





Stationary Source Audit Program (SSAP) Organizational Chart





SSAP Organizational Chart

TNI SSAS Committee Administration of Program



Writes and maintains requirements for:

- Audit Sample Providers (TNI SSAS Vol. 1, Module 1)
- Audit Sample Provider Accreditors (TNI SSAS Vol. 1, Module 2)
- Regulators, Facilities, Testers, and Laboratories (TNI SSAS Vol. 1, Module 3)





SSAP Organizational Chart

TNI SSAS Committee: Administration of Program



Writes and maintains SOPs governing all aspects of the administration of the TNI SSAS Program.



Maintains Audit Sample Database.
(access restricted to Regulators)



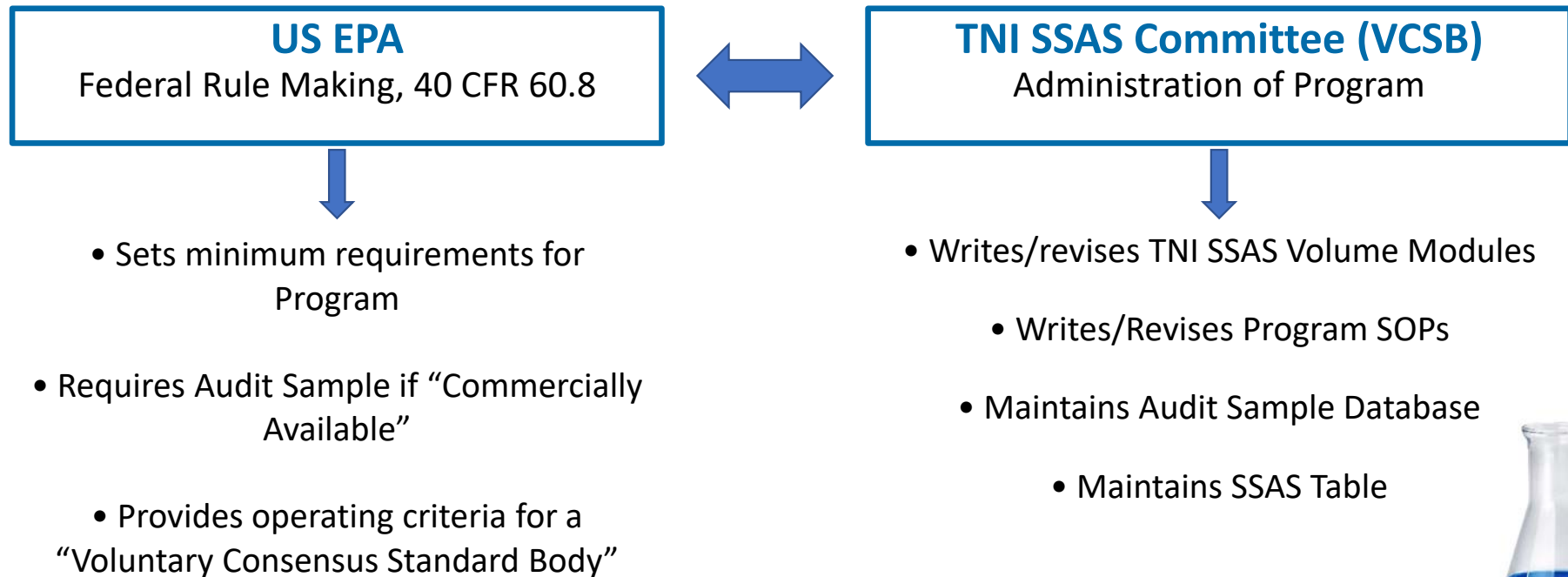
Maintains Audit Sample Table:
Availability, conc. ranges, method/analyte codes.





Stationary Source Audit Program

Organizational Chart



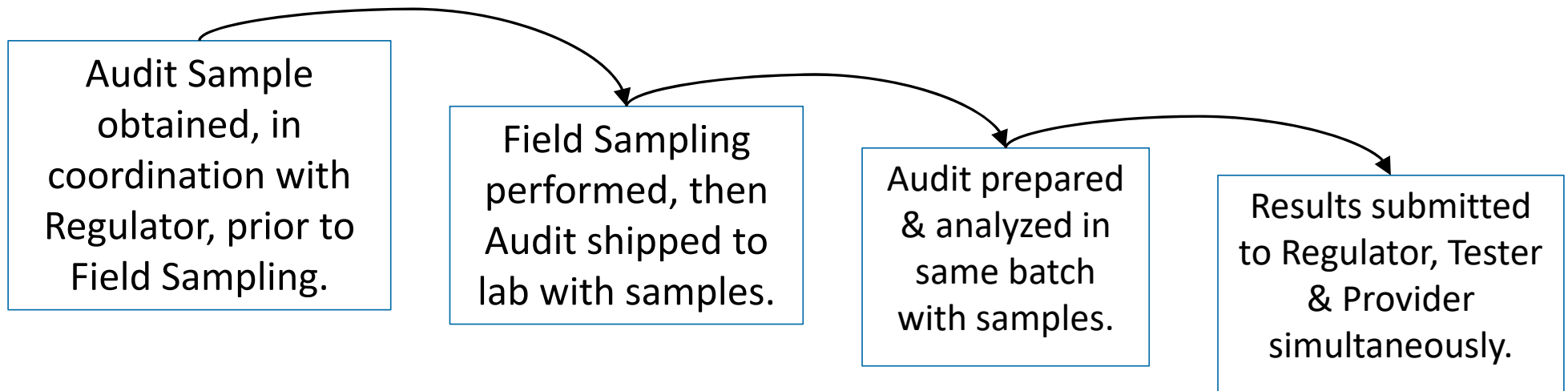


TNI SSAS Committee Survey

1. Answers indicated lack of understanding of Program Organization.
2. Answers indicated large divide between Source Testers and Regulators as to value of Program, and confusion about differences between Proficiency Testing (PT) Samples and Audit Samples.



How Audits work



Regulator decides if Audit results impact the compliance status of samples.

Audit Samples are not the same as PT samples.





TNI SSAS Committee Survey

1. Answers indicated lack of understanding of Program Organization.
2. Answers indicated large divide between Source Testers and Regulators as to value of Program, and confusion about differences between Proficiency Testing (PT) Samples and Audit Samples.
3. Both Testers and Regulators agreed that Audit Sample concentrations should be lower for some methods.





What the TNI SSAS Committee has been doing

- Wrote SOP 6-100: “Conducting Pilot Studies” to allow for lowering of Audit Sample Concentrations.
- Revising SOP 6-101: “Management of the SSAS Table” to allow for new concentration ranges/acceptance limits to be formally placed on table.
- Revising TNI SSAS Volume 1, all modules. Focus on eliminating problem areas discovered while the Audit Program was active.





Future TNI SSAS Committee actions

- Reaching out to Stationary Source Emissions Stakeholders to bring more people onto the Committee, especially Testers.
- Publishing quarterly updates in the Source Evaluation Society (SES) Newsletter.
- After SOPs and Volume revisions complete, reach out to accredited PT Providers.





Conclusions

- Source Sample Audit Program (SSAP) not well understood. Committee working on educating stakeholders.
- Availability and interest of sufficient third-party audit sample providers may have been overestimated. Committee attempting to make process less onerous, but cannot force a third party entity to provide Audit Samples.
- Committee continues to meet twice monthly to facilitate resumption of SSAP (Audit availability by second provider).





Questions?

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The TNI SSAS Expert Committee is currently looking for new members with fresh ideas. If you have interest in having your voice heard and being part of the process, please email Sheri Heldstab (sheldstab@chesterlab.net).

