

**THE NELAC INSTITUTE
STATIONARY SOURCE AUDIT SAMPLE (SSAS) PROGRAM**

FREQUENTLY ASKED QUESTIONS

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SSAS Expert Committee

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1. What are the differences between an audit sample and a proficiency testing (PT) sample?

An audit sample, which composition is unknown to the Stationary Source Tester and Laboratory, is used to evaluate, during a particular test event, whether the Stationary Source Tester and/or Laboratory can produce measurement results within specified acceptance criteria. Audit samples are not analyzed on a regular schedule, but they are analyzed only during the particular event (e.g., a compliance test) that is being audited. Audit samples are analyzed, or collected and analyzed, as part of the batch of field test samples using the same personnel, procedures, and materials.

A PT sample, which composition is unknown to the Laboratory, is used to test whether the Laboratory can produce analytical results within the specified acceptance criteria. PT samples are analyzed on a regular schedule. PT samples are required for the accreditation of environmental laboratories in many states.

2. What is a quality control (QC) sample?

A QC sample, which composition is known to the Stationary Source Tester and Laboratory, is used as a practice sample for internal purposes only. QC samples may be purchased from any Provider and may be analyzed at any time desired.

3. How do I find a Provider?

A list of Providers accredited to provide audit samples may be found on the Provider Accreditor website <http://www.a2la.org>.

4. Will the Regulatory Agency handle the approval process for audit sample requests separately from the review of the Test Protocol?

Consult with the appropriate Regulatory Agency since each of them may follow different approval procedures.

5. Do Laboratories need to be accredited to analyze audit samples?

Consult with the appropriate Regulatory Agency since each of them may require different types of accreditation or certification.

6. What types of stationary source tests require audit samples (e.g., initial tests to demonstrate compliance with the New Source Performance Standards (NSPS) or the National Emission Standards for Hazardous Air Pollutants (NESHAPS) under 40 CFR Parts 60, 61, or 63, retesting if initial stationary source test exceeded emission limits, retesting if failed an audit sample test, periodic testing (e.g., every 5 years under Title V), EPA enforcement related tests, State Implementation Plan (SIP) rules under Title 40 Part 51, Relative Accuracy Test Audits (RATAs), etc.)?

Consult the appropriate Regulatory Agency. They will provide information when and under what conditions are audit samples required.

7. How many audit samples should I order? Does one audit sample apply to more than one test? For a test for 10 different sources, are the Facilities required to purchase one audit sample, or are they required to purchase 10 audit samples (one per source)?

The number of audit samples to be ordered will be determined in consultation with the appropriate Regulatory Agency. In some cases, a single audit sample may be used for multiple emission units based on a case-by-case evaluation, subject to Regulatory Agency approval. Some factors that the Regulatory Agency may take into consideration in allowing one audit sample to be used for multiple emission units include, but are not limited to:

- a) All emission units are at the same facility.
- b) The same Stationary Source Tester, Laboratory, analyst, equipment, etc., will be used for all the emission units being tested. Specifically, Section 4.4.1 of the Participants Standard (Volume 1, Module 3) states, "The Laboratory shall use the same staff, sample tracking, sample storage, preparation, analysis methods, equipment, materials, standard operating procedures, calibration techniques, quality control procedures, and quality control acceptance criteria for the stationary source test samples and the audit samples."
- c) The single audit sample concentration would be applicable/appropriate to all of the emission units that would be quality assured through its use.

- d) All the emission units are tested during the same time frame/mobilization.
- e) The use of a single audit sample for multiple emission units would not contravene any other regulatory requirement.

8. What if a Facility fails to order audit samples?

The failure to order an audit sample should be discussed with the appropriate Regulatory Agency.

9. What if a compliance test program is completed without audit samples? Does that invalidate the test program?

Consult the appropriate Regulatory Agency.

10. Is a chain of custody (COC) record necessary when transferring samples from the field to the Laboratory?

Yes, accompanying COC record is required and whether or not the audit samples have been opened.

11. How far in advance do I need to order audit samples?

Placing the order 21 to 30 days before the sampling event is adequate. Note, however, that it is recommend to first contact the appropriate Regulatory Agency for specific guidance prior to submitting an order.

12. How are my questions or complaints regarding the audit sample(s) addressed?

Refer to Section 5.4 of the Provider Standard (Volume 1, Module 1) and Section 6.0 of the Participants Standard (Volume 1, Module 3).

13. If audit sample results failed acceptance criteria, what constitutes corrective action?

Corrective action will be dependent on the reason for the failure (e.g., calculation error or dilution error). Consult with the appropriate Regulatory Agency since each one of them may require different corrective action in each case.

14. Is there a flow chart to illustrate the audit sample process from beginning to end?

Yes, see Attachment 1.

15. How do I create a Stationary Source Test Project ID?

The following requirements apply:

- a) IDs can contain letters, numbers, and punctuation including periods, parentheses, and hyphens (dashes).
- b) Commas and quotation marks (double and single) are not allowed.
- c) Maximum of 25 characters are allowed.

16. Are the necessary ancillary equipment available (e.g., cga350, for Methods 25 and 18)?

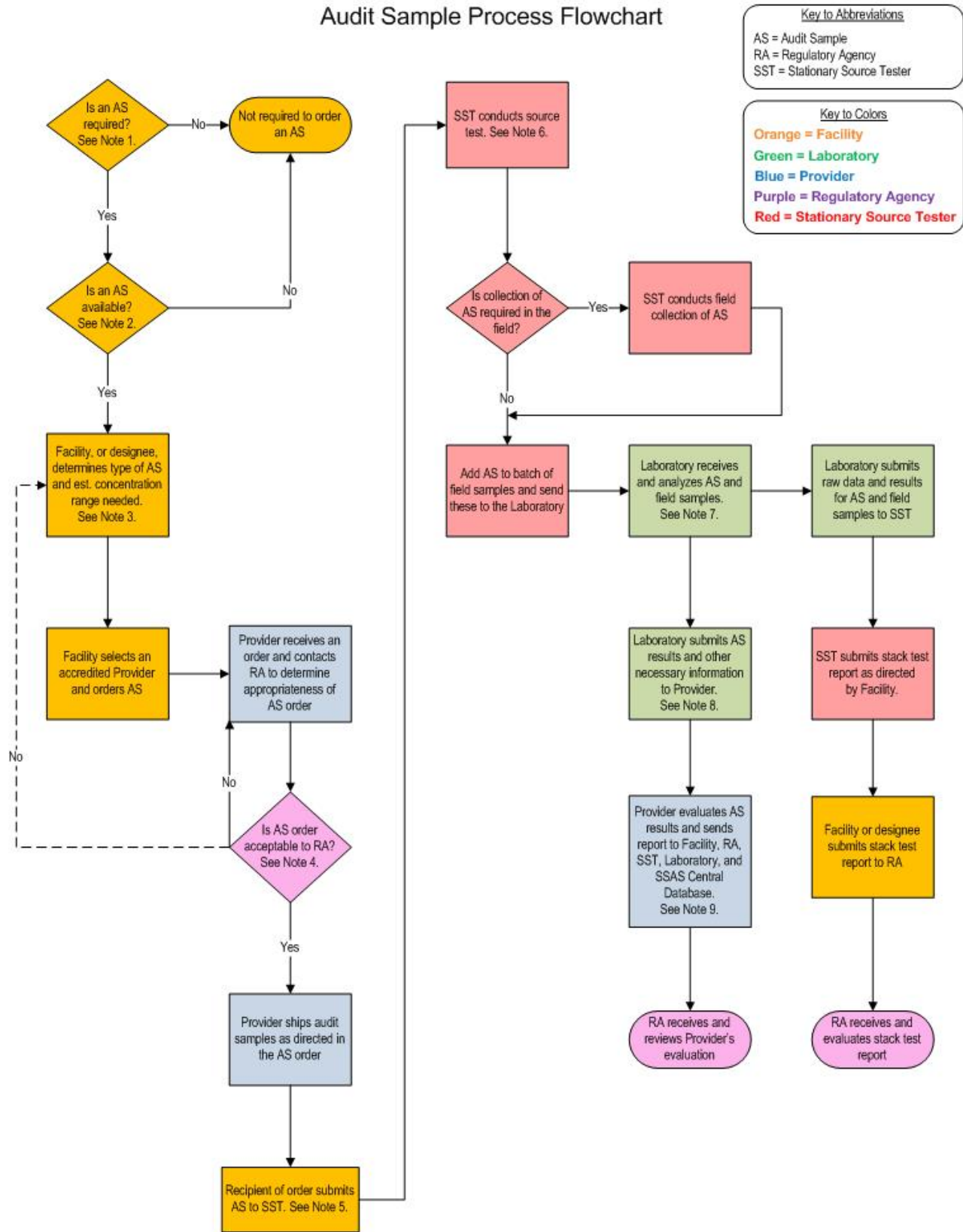
Check with your Provider.

17. Are there special storage and handling requirements for the audit sample (e.g., particulate/liquid/gas samples temperature/hold times)?

Instructions will be provided with each audit sample shipment. The Provider is required to include this information with each shipment. For specific details or concerns, contact your Provider.

Attachment 1

Audit Sample Process Flowchart



Attachment 1 Notes:

1. Facility, or designee (e.g., Stationary Source Tester, consultant, etc.), must determine whether one or more audit samples are required for each test method, matrix, and analyte.
2. Consult the SSAS Table published on the TNI website and the list of Providers published on the Provider Accreditor's website (see FAQ #3).
3. Consult the Regulatory Agency or the EPA for guidance.
4. Per Section 8.0 of the Provider Standard (Volume 1, Module 1), the Provider may ship the audit sample as ordered, if response is not received from the Regulatory Agency within fifteen (15) calendar days of such request.

It is the responsibility of the Regulatory Agency to evaluate the method, container, matrix, analytes, and analyte levels proposed for the audit sample and to choose, in consultation with the Provider, analyte levels that best audit the test and are blind to the other Participants. If any aspects of the audit sample, except the analyte levels must be changed, the Regulatory Agency shall inform the Facility as well as the Provider so that the Facility can also change the order as the Regulatory Agency requires.

5. If there are questions or complaints regarding the audit sample order, consult Section 6.0 of the Participants Standard (Volume 1, Module 3) on the procedures to follow to submit your questions/complaints.
6. The Stationary Source Tester must ensure that the audit sample is available on-site when conducting the stack test.
7. The Laboratory must handle, store, and analyze each audit sample in the same batch and in the same manner as the stationary source test samples for the test method and analyte being audited. For more details, see Section 4.4 of the Participants Standard (Volume 1, Module 3).
8. The Laboratory submittal to the Provider must include the Stationary Source Test Project ID and other pertinent information defined in Section 11.2 of the Provider Standard (Volume 1, Module 1), to enable the Provider to generate its evaluation report.
9. If there are questions or complaints regarding the Provider's evaluation of the audit sample results, consult Section 6.0 of the Participants Standard (Volume 1, Module 3) on the procedures to follow to submit your questions/complaints.