

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

FREQUENTLY ASKED QUESTIONS

Revision No.: 1

Revision Date: April 5, 2010

Prepared by
TNI SSAS Expert Committee

DISCLAIMER: This document provides answers to frequently asked questions regarding the TNI SSAS Program. This document has not been reviewed or endorsed by the TNI Board of Directors.



PO Box 2439
Weatherford, TX 76086
www.nelac-institute.org

This document provides guidance for frequently asked questions regarding the TNI SSAS Program, and represents the opinion of its authors. It is intended solely as guidance and does not include any mandatory requirements except where such requirements are referenced. This guidance does not establish expectations of being implemented universally, exclusively, in whole, or in part.

This guidance does not establish or affect legal rights or obligations and is not finally determinative of the issues it addresses. It does not create any rights enforceable by any party in litigation with TNI, its accreditation bodies, or affiliated institutions. Any decisions made by TNI regarding requirements addressed in this guidance will be made by applying the applicable standards, policies, or procedures to the relevant facts. Interested parties are free to raise questions and objections about the application of this guidance to a particular situation. Regulatory Agencies retain the discretion to adopt approaches on a case-by-case basis that differ from those described in this guidance, where appropriate. This document may be revised without public notice.

Further questions concerning applicability and enforcement should be addressed to the EPA's Emission Measurement Center (EMC). For more information, visit the EMC website at <http://www.epa.gov/ttn/emc/email.html#audit>.

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> and on the TNI website <http://www.nelac-institute.org>.

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

NELAC accreditation is not necessary unless otherwise required by the Regulatory Agency mandating the stationary source test. Some Regulatory Agencies may require other types of accreditation.

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

The TNI SSAS Standard does not require use of a COC but use of one is recommended.

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

Placing the order 21 to 30 days before the sampling event is adequate as long as prior approval regarding the order has been received from the appropriate Regulatory Agency.

7. 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).

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

Yes, see Attachment 1.

9. What requirements should be met when the Facility or the Stationary Source Tester creates a Stationary Source Test Project ID for use in the SSAS Central Database?

The following requirements apply either to newly created or existing Stationary Source Test Project IDs:

- 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.

10. Is ancillary equipment necessary for Method 25 and Method 18 audit samples?

Yes, an appropriate step-down flow regulator may be required to retrieve sample from high-pressure cylinders. Check with your Provider.

11. 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.

12. Where can I obtain information regarding applicability and enforcement of the EPA's Stationary Source Compliance Audit Program?

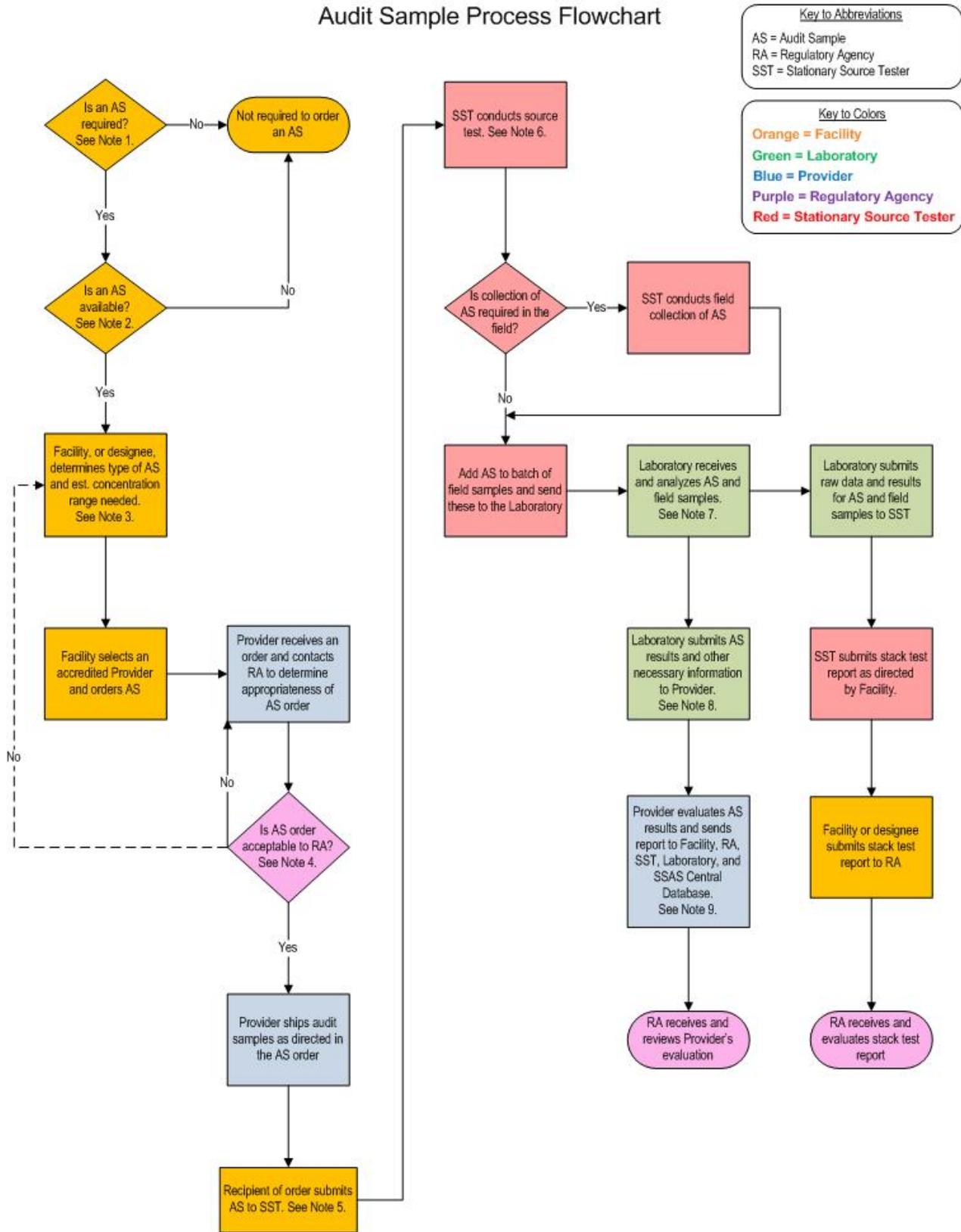
Questions concerning applicability and enforcement should be addressed to the EPA's Emission Measurement Center. For more information, visit <http://www.epa.gov/ttn/emc/email.html#audit>.

13. Who can I contact with additional questions regarding the TNI SSAS Standard?

Questions concerning the TNI SSAS Standard may be addressed to Maria Friedman, Chair of the TNI SSAS Expert Committee, at maria.friedman@testamericainc.com.

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. The TNI SSAS Program recommends consulting with your Regulatory Agency.
2. Consult the SSAS Table published on the TNI website and the list of Providers published on the Provider Accreditor's website and on the TNI 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). Additional instructions from the Providers must be followed.
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.