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Source Audit Program

TNI SSAS Committee Update: Survey Findings & Current Focus

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Many have expressed interest in the current status of the Audit Sample Program. After the withdrawal of one of the Audit Providers from the Stationary Source Audit Sample Program in May of 2019, the TNI **Stationary Source Audit Sample (SSAS)** Committee sent out a survey to known stakeholders, and most of the results were not surprising. The majority of source testers who responded believed that the audit samples did not add value to the testing results, while the majority of regulators did.

One surprising finding of the survey was the large number of stakeholders who were confused about TNI’s role and responsibility in the Audit Sample Program.

Audit samples have been required since the early 1980s by the EPA. At that time, the EPA supplied Audit Samples for free. In 2009, the EPA proposed to restructure the Audit Sample Program¹, stating “*Over the past few years ... there has been an increasing need for [audit] samples and a number of private providers have emerged. EPA believes it is no longer necessary for it to supply audit samples ...*”

In the 2010 Final Rule², the EPA defined the requirements for a **Voluntary Consensus Standards Body (VCSB)** to administer the Program, and TNI stepped in to meet the EPA’s criteria of a **VCSB**. In 2011, the TNI **SSAS** Expert Committee (“the Committee”) was formally recognized by the EPA as a **VCSB** with the ability to administer the Audit Program.

The EPA is responsible for:

- Setting the minimum technical requirements for an approvable audit sample program;
- Requiring Audit Samples if “commercially available³”; and
- Defining “commercially available”.

The Committee does not have the authority to determine whether an Audit Sample is required for regulatory testing, nor does it have the authority to change the definition of “commercially available”.

The Committee is tasked with writing and revising the TNI **SSAS** Volume Modules governing the responsibilities for Audit Providers, Audit Provider Accreditors, Laboratories, Testers, Facilities, and Regulators.

The Committee is also responsible for writing Standard Operating Procedures (SOPs) for the operation of the Program. In addition, the Committee is required to perform a periodic review of acceptance limits for Audit Samples in use.

Not surprisingly, the survey showed both Testers and Regulators want lower concentration ranges for audit samples, particularly for Methods 26/26A and Method 29.

Since May of 2019, the Committee has been working intensively on writing SOPs that would allow for the lowering of concentration ranges. The Committee plans to have these SOPs finalized by August 2020, and continues to meet at twice the normal frequency to accomplish this goal. After the SOPs are completed, the Committee will return to revising the **SSAS** Volume Modules.

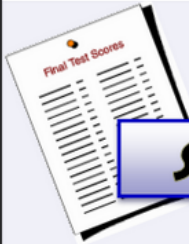
¹ 74 FR 28451 (June 16, 2009)

² 75 FR 55636 (September 13, 2010).

³ See the EPA’s Frequently Asked Questions #10 “What sources are required to use audits?” <https://www3.epa.gov/ttn/emc/email/SSAPFAQs.pdf>



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As of the submission of this update, the Committee has not heard from any potential new Providers, and Audit Samples remain voluntary.

Once the SOPs and Modules have been approved, the Committee plans to reach out to TNI accredited PT Providers to see if any of the PT Providers might have interest in joining the Audit Sample Program.

TNI and the TNI **SSAS** Committee encourage stakeholder participation in its conference calls. The Committee's regularly scheduled conference call is on the third Monday of each month at 2:00 PM Eastern.

The Committee is currently having additional conference calls on the first Monday of each month at 2:30 PM Eastern. Each call lasts 1 ½ hours.

For more information, contact the Committee Chair.

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Note: All illustrations are from the Editor

