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Source Audit Program

Sen-SSAS-tional News:

An update from the TNI SSAS Expert Committee

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The EPA's Stationary Source Audit Program is still suspended due to a lack of a second Audit Sample Provider.

The Stationary Source Audit Sample (SSAS) Expert Committee finalized SOP 6-101 “SSAS Table Management” in January of 2021, and the SOP has moved on to the Policy Committee for final review. One item of note is that in a recent court case, the defendant lost their case because a document used the word “shall” to mean “must”. While the EPA uses the two synonymously, the court did not agree. To avoid future liability issues, the next update of the SSAS Volume will no longer use the word “shall”, instead using “must”.

During the virtual Winter Conference of the National Environmental Laboratory Accreditation Conference (TNI) in January, 2021, there was a discussion of creating a Field of Proficiency Testing Table (FoPT) for the matrix of Air and Emissions. If such a table were to be created, accredited laboratories would be required to analyze two Proficiency Testing samples per year per accredited method/analyte combination, at their own expense. While this would not directly impact Source Testers, it would provide better legal defensibility of data generated by laboratories. Creating an FoPT for Air and Emissions would not be a simple undertaking, as the matrix would need to include ambient air, indoor (non-workplace) air, source emissions, mobile emissions, etc. The feasibility of creating an FoPT for Air and Emissions is currently in discussion within TNI, and there is no certainty at this time that an FoPT will be created for Air and Emissions.

“SHALL vs. MUST”

In February, the SSAS Committee held a public webinar to discuss proposed changes to the SSAS Volume Modules. The change that would affect Source Samplers the most is a new requirement that Audit Samples must be stored following the Provider's instructions, which are typically found inside the shipping box. This would require Testers to have a system in place by which they have documented evidence of having stored the Audit Samples appropriately.

During the webinar, a suggestion was made that audit samples might be split in half such that half of the audit could be placed in the train and recovered, similar to a proof blank for Method 202; and the other half would be sent to the laboratory unopened. This proposal would allow for the inclusion of at least some of the uncertainty in the field sampling aspects of the methods in the final audit results, however it creates the problem of which result to report (or possibly both results get reported) and which result would be the most important to a regulator. The SSAS Committee is currently in discussion as to the feasibility of this idea.

The updated SSAS Volume Modules are not yet Draft Standards. When the Committee has voted to make them Draft Standards, a public announcement will be made with a public comment period during which anyone may comment on the Standard. Comments may be about proposed changes or about existing text within the Standard.

TNI and the TNI SSAS Committee encourage stakeholder participation on conference calls. The Committee's regularly scheduled conference call is on the third Monday of each month at 2:00 pm Eastern. Each call lasts 1 ½ hours. Contact the Committee Chair (sheldstab@chesterlab.net) if you are interested in participating.

