

The Future of EPA's Stationary Source Audit Program (SSAP)

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What Is the SSAP?

- Provides Audit Samples to State and Local Agencies For Tests to Demonstrate Compliance with Emission Limits
- Regulatory requirement in 40 CFR Part 51, 60, 61 and 63.
 - About 37 different methods require audit samples

How Does the SSAP Work?

- Audit Samples Can Be Ordered by Registered Users from the SSAP Database (www.sscap.net/index.html)
- Samples Are Shipped to the User or to an Address specified by the User
- The Tester Performing the Compliance Test Measures the Audit Sample and Reports the Results to the User

How Does the SSAP Work?

- The User Reports the Result to the Database and Gets Immediate Pass/Fail Results
- Registered Users Have Access to Historical Results Stored in the Database

Program Costs

- Costs ~\$225,000/year
- Audit program needs capital improvements ~\$750,000 over five years

What does SSAP audit?

- Currently Audit Samples Are Available for the Following 14 EPA Methods
- Methods 6, 7, 8, 12, 13A, 13B, 23, 24, 25, 26, 26A, 29, 101A, and 315

EPA Internal Assessment Team

- Discussed the current SSAP issues and considered a number of options
- Outreach
 - Attended The NELAC Institute (TNI) meeting to discuss restructuring the program
 - Coordinated with EPA's Office of Water to discuss how they restructured their Performance Evaluation Program
 - Met with NACAA to listen to concerns

What Options Did the EPA Assessment Consider?

- Shutting the SSAP down.
- Continued EPA funding.
- Asking the States to provide funding.

- Restructuring the SSAP to allow accredited sample providers to sell audit samples.

Private Provider

- Private labs provide audit samples.
- American Association for Laboratory Accreditation (A2LA) sets accreditation criteria for operating labs.
- TNI brings stakeholders together.

How will the Accredited Sample Provider Option be Implemented?

- Work with the accrediting body to develop a criteria document that would describe how the program would work
- Amend existing rules to state that audit samples will be available from accredited sample providers and not from EPA

EPA Interim Measures

- Fund the program one more year (to October 2008) to allow time to find alternatives.
- One more year of funding to October 2009) to allow time for rulemaking

Some Issues to be Resolved

- How to order samples and get the results in the regulator's hands.
- Who will keep the data.

State and Local Concerns

- Expand the program to cover more test methods.
- Transition to private providers should be transparent.
- Whoever pays the bill owns the sample.
- Can the tester guess the answer without analyzing?

State and Local Concerns

- How do we handle the billing?
- How much will samples cost?
- Get better participation in the program.
- EPA should maintain some oversight of the program.

State and Local Concerns

CAA – Section 101, a.4

- Federal financial assistance and leadership is essential for the development of cooperative Federal, State, regional, and local programs to prevent and control air pollution.

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