

## EPA Part 75 Conformance

We have reviewed 2012 EPA Part 75 test reports and discussed EPA's electronic reporting and source tester requirements with Part 75 source owners. We conclude that many owners and environmental specialists who enter test data into EPA databases are not familiar with the range of EPA's expectations for source tester (Air Emission Testing Body or AETB) conformance to ASTM D7036-04.

That rule's Requirements for Air Emission Testing require that as of March 27, 2012, the unit owner or operator must document that all relative accuracy test audits (RATAs) and stack tests performed under Part 75 have been conducted by an AETB that has documented conformance to the ASTM D7036-04 standard.

EPA's pertaining language has evolved through extended discussions with industry, AETBs, and agencies. The regulation establishes requirements and includes suggestions intended to verify AETB conformance to ASTM D7036.

**The requirement:** Owner must obtain certification, either in the form of Certificate of accreditation or interim accreditation from a recognized, national accreditation body, or Letter of certification signed by AETB senior manager

**The suggestion:** EPA's next statement (admonition?) is of considerable interest. Part 75 states that while owners and operators are under no obligation to do so, they may find it useful for AETBs to provide a copy of the following:

- Quality manual
- Results of internal audits
- Performance data and corrective actions
- Training records

Certainly these documents are essential for demonstrating an AETB's conformance to ASTM D7036 requirements. However, by choosing an accredited AETB the source owner, who may otherwise feel burdened with reviewing these documents, no longer carries personal responsibility to assess that AETB's conformance to ASTM D7036-04.

An accredited or interim accredited AETB is known to have submitted these and other documents subject to rigorous third-party scrutiny by the Stack Testing Accreditation Council (STAC). STAC is presently the only recognized accrediting organization for the ASTM D7036-04 standard. STAC also will have extensively assessed the AETB's processes, documentation, and facility.

ASTM D7036-04 is an ISO 17025 derivative, and a far more rigorous and demanding quality management and competency demonstration initiative than the above four components suggest. The third party assessment provides independent confirmation that a company understands and implements the requirements of ASTM D7036-04.

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