

10.3.3 Field Audits and Inspections

In many instances, the field audits are integrated with routine source inspections. The audits encourage good monitoring practices by raising plant awareness of Part 75 requirements. Field audits generally include the following activities:

- Pre-audit preparation (e.g., monitoring plan review, examination of historical data, etc.);
- On-site inspection of the monitoring equipment and system peripherals;
- Records review;
- QA test observations; and
- Interviews with the appropriate plant personnel.

EPA has developed a Field Audit Manual, which is available on the Internet⁷². The Field Audit Manual details recommended procedures for conducting field audits of Part 75 CEMS. The Manual includes tools that can be used to prepare for an audit, techniques that can be used to conduct the on-site inspections and records review, proper methods for observing QA tests, and guidelines for preparing a final report.

Checklists are also provided that can be used to ensure that all necessary data is obtained during the audit. EPA has designed the audit procedures in the Manual so that personnel with varying levels of experience can use them. Three levels of audits are described in the Manual:

- A Level 1 audit, consisting of on-site inspection of the CEM equipment, records review, and observation of a daily calibration error test;
- A Level 2 audit, including all of the Level 1 activities, plus observation of a linearity check or RATA; and
- A Level 3 audit, including the Level 1 activities, plus a performance test (linearity check or RATA) conducted by agency personnel.

Any State or local agency can perform a Level 1 or Level 2 audit, but not all agencies have the necessary equipment or expertise to conduct the performance test required by the Level 3 audit.