

Question 8.1

Topic: Quality Assurance RATAs

Question: Following successful certification, when is the first RATA required?

Answer: According to Section 2.3 of Appendix B to 40 CFR Part 75, the requirement to conduct semiannual or annual relative accuracy test audits (RATAs) is effective as of the calendar quarter following the quarter in which the monitor is provisionally certified (the date when certification testing is completed). Therefore, depending upon whether or not the relative accuracy measured during the initial monitor certification qualifies the monitor for an annual RATA frequency, the *projected* deadline for the next RATA would either be the second or fourth calendar quarter following the quarter during which the monitor is provisionally certified. However, as explained in the following paragraphs, the *projected* RATA deadline may not be the *actual* deadline, depending on how much a unit operates and what type of fuel is combusted.

The May 26, 1999 revisions to Part 75 changed the method of determining RATA deadlines from a calendar quarter basis to a QA operating quarter basis. A QA operating quarter is a calendar quarter in which there are
_ 168 unit or stack operating hours. Partial operating hours are counted as full hours in determining whether a quarter is a QA operating quarter (see definitions of unit operating hour and stack operating hour in § 72.2). If a CEMS obtains a semiannual RATA frequency, the next RATA is due by the end of the second QA operating quarter following the quarter in which the RATA is completed. Similarly, an annual RATA frequency means that the next RATA is due by the end of the fourth QA operating quarter following the quarter in which the RATA is completed.

For units that consistently operate more than 168 hours in each quarter, there will be little or no difference between the calendar quarter and QA operating quarter methods of determining RATA deadlines. However, for units that operate infrequently in a calendar quarter (< 168 unit operating hours), a one quarter extension is given for each calendar quarter that does not qualify as a QA operating quarter. Also, for units that burn only very low sulfur fuel (as defined in § 72.2) during a particular calendar quarter, a one quarter extension of the SO₂ monitor RATA deadline may be claimed. Note that there is an upper limit on all such RATA deadline extensions.

The deadline may not be extended beyond the end of the eighth calendar quarter following the quarter in which a RATA was last performed. If unforeseen circumstances prevent a RATA from being completed by the deadline, the grace period provision in Section 2.3.3 of Appendix B may be used.

References: Appendix B, Section 2.3

History: First published in original March 1993 Policy Manual; revised in July

1995, Update #6; revised in October 1999 Revised Manual; revised in
2013 Manual