

Question 28.10

Topic: ASTM D7036-04

Question: We have a client who awarded us a contract to perform RATAs of some Part 75 sources this year. We are not an accredited testing company, nor do we currently have any Qualified Individuals (QIs) who have met the requirements of ASTM D7036-04 and qualify to conduct or oversee Part 75 RATAs. My questions are:

1. Can our technician perform the tests if we subcontract with another company to provide us with a QI to oversee the testing?
2. If the answer to Question #1 is “yes”, can we write the test report and have QI sign off on it?

Are there any other air regulations besides Part 75 that require an AETB to perform the emission testing with an on-site QI present, thereby ruling out companies like ours from conducting the tests?

Answer: Note that section 6.1.2 of Part 75, Appendix A requires a company to either be “accredited” or “interim accredited” to ASTM D7036-04 for the relevant test methods, or provide a letter from senior management certifying that the company complies with ASTM D7036-04 for the relevant test methods.

If a prime contractor who is not an AETB hires a subcontractor to do Part 75 testing, then the subcontractor must be an AETB, and all personnel doing the testing must either be employees of the subcontractor or under contract to the subcontractor. The subcontractor must ensure that any contracted personnel are supervised and competent and that they work in accordance with the subcontractor’s (AETB’s) quality system.

The subcontractor would be responsible for all aspects of the testing, including providing at least one Qualified Individual on-site to oversee and supervise the Part 75 testing, providing all of the necessary testing equipment, collecting the test data, performing calculations, writing the report, etc. Having a Qualified Individual from the subcontractor on-site, while using the prime contractor’s (non-AETB’s) personnel and equipment to perform the testing, is not sufficient to comply with ASTM D7036-04 and Part 75.

There are no Federal rules other than Part 75 for which EPA requires an AETB to conduct the testing, with a QI present on-site. It is possible that some State air agencies may require testers to conform to ASTM D7036-04 when conducting stack tests required by source operating permits.

References:

History: First published in 2013 Manual