

Question 28.9

Topic: External Exam Requirements

Question: Section 3.1.5 of ASTM D 7036-04 mentions an external qualification exam. In section 8.3.5 it lists the requirements of the exam, and section 8.3.6 states that external qualification exams must be used if available.

Does this mean that my company cannot put together its own exams for the test methods that we perform instead of taking the Source Evaluation Society exams?

If so, then could an external company put together a test for us to take or could we put together a test for them, as long as both parties had the test given by a proctor, e.g., the Sylvan learning center?

The test questions would be taken from 40 CFR Parts 60 and 75, the safety manual, and any laws/ordinances. I only ask this question because we would like to be tested only on the methods that we actually perform, and the current exams are not set up this way.

Answer: Section 3.1.14 of ASTM D7036-04 defines "qualification exam provider" as "a recognized association of AETBs who oversees, maintains, or approves, or a combination of the three the format and content of qualification exams. . ." EPA interprets "recognized association of AETBs" to mean Accreditation Council, or the Source Testing Association (England). There may be others. The rationale for this requirement is to better ensure the quality of the exam questions.

Unfortunately, having a single external company develop an exam does not meet the ASTM D7036-04 requirement. However, it may be possible for you or some other company to develop an exam and have it vetted by a recognized association of AETBs.

If you or any of your colleagues seek to become Qualified Individuals for Part 75 testing, you may be interested to know that SES has developed a new Group 5 exam which is specific to the test methods used in Part 75.

References:

History: First published in 2013 Manual