

Building Platforms Is Part of the Job

Yesterday	Today
Plywood, Plan, & a Peer	Paper, Process, & Proof
Saw Plywood Two by Fours Test Plan Agency Observer	Quality Management Plan Covering <ul style="list-style-type: none"> •Quality Management Standards <ul style="list-style-type: none"> •ASTM D7036-04 •ISO 17025 •FSMO-V1-2010 •State Programs <i>With increased emphasis on:</i> <ul style="list-style-type: none"> •Audit & Proficiency Test Materials •Employee Proficiency Demonstration <ul style="list-style-type: none"> •Qualified Individual Exams <ul style="list-style-type: none"> •Internal •External •Procedures •Recordkeeping

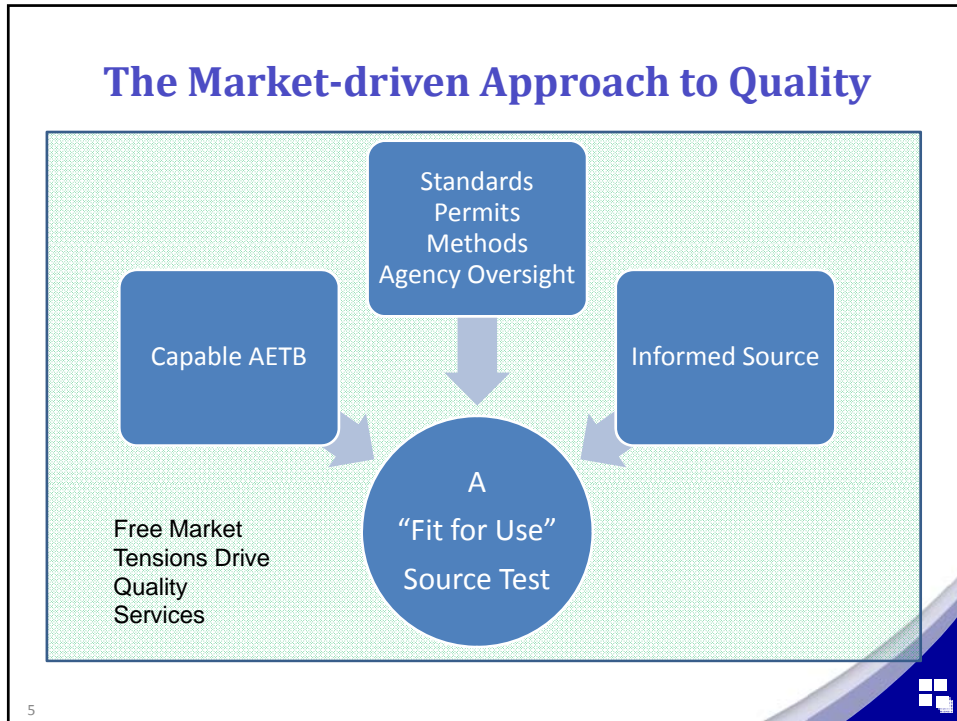
3

What Is Quality?

“Quality is fitness for use or purpose.”
Joseph Juran

- Simple definition covers it all.
- Focus is on the outcome, not necessarily the steps.
- **But**, definition does not shortchange process when process is integral to fitness for use or purpose.

4

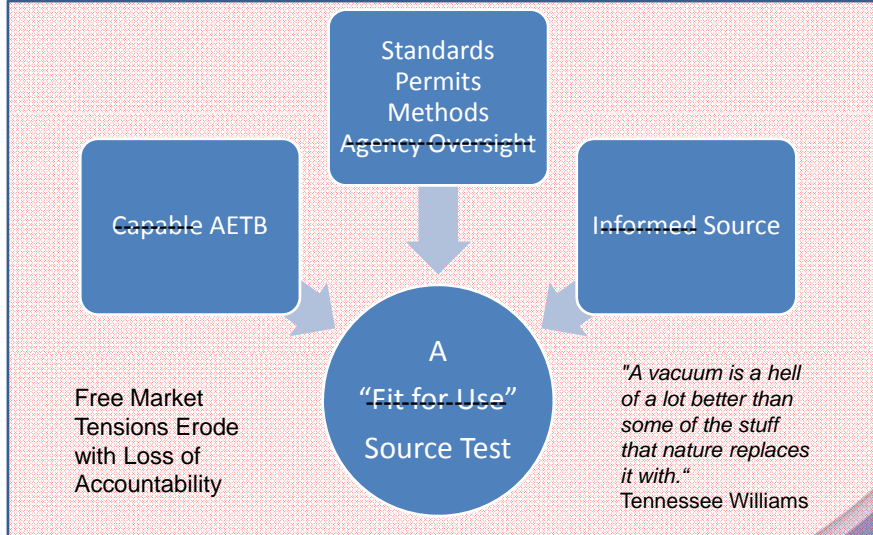


EPA Reports that the Market-Driven Approach is Not Working for Source Testing

- Preamble to Final Rule for Minimum Competency Requirements for Air Emission Testing:
 - "EPA believes the evidence is strong that unqualified, under-trained and inexperienced testers are routinely deployed on testing projects."
 - "There are many reasons why voluntary compliance has not worked, including disagreement among stack test companies on a minimum competency standard, and the sources' often used practice of hiring the lowest bidder."
- But regulatory oversight has changed too.
 - Shrinking budgets mean:
 - Less observation, electronic reporting
 - Delayed, and less critical report reviews

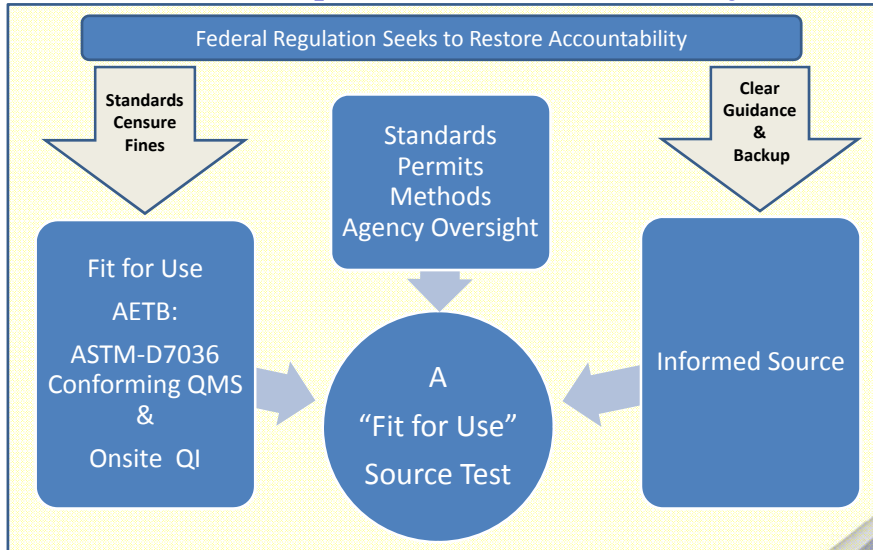
6

Society Seeks a Guarantor or Enforcer when Free Market Forces Fail



7

AETB Minimum Competency Rule Imposes Federal Law to Improve Source Test Quality



8

Will an Imposed Standard Improve Source Test Quality?

- A standard does not have the power to improve quality.
- But people do.
 - Source testers who accept and advance the standard will.
 - Sources who value conformance enough to examine AETB credentials/claims will.
 - Accrediting organizations and auditors who recognize the value of function over form will.
 - Regulators who follow through on their authorities will.

9

AETB Can Respond in Four Ways

1. Close shop.
2. Perform only work that is not subject to the standard.
3. Plan on negotiating when caught.
4. Comply with the rule and conform to the standard.

10

Minimum Competency Rule Describes the Essence of Compliance

- Statement of Conformance to ASTM D7036-04
 - Can be limited to only Part 75 work
- Quality Manual
- Qualified Individual on Site
 - Proof of QI claim
 - Endorsement of SES Exams
- Internal & External Audits
- Performance Data

11

Compliance: The Five Step Program

1. Be who you say you are.
2. Describe how you will conduct yourself.
3. Conduct yourself as you have described.
4. Get better at what you do.
5. Be able to prove your claims.

12

Be Who You Say You Are

- You can choose to conform to the standard in one of two ways:
 - Self-certify:
 - You adopt the standard, put the required systems in place, and you check your own conformance to the standard.
 - Third-party accreditation:
 - You adopt the standard, put the required systems in place, retain an independent accrediting organization (an entity with expertise in the standard and AETB operations) to check your system, address findings, and reference accreditation in accordance with the rules set by the accrediting organization.

Self-accreditation, though possible in some disciplines, is not an option.

13

Describe How You Conduct Yourself ^(1/2)

- Prepare a Quality Manual that Reflects Your Operation
 - You can start with a template or one that you've picked up from a colleague.
 - But it needs to reflect your operation and approach to business.
 - And if you're working off pirated documents, you might want to think through that decision.
 - Decide how you want to approach the “scope” of your work.
 - Anything and everything you do.
 - A declared subset of what you do.

14

Describe How You Conduct Yourself ^(2/2)

- Decide How to Deal with Procedures
 - Procedure(s) appears 36 times in the standard
 - Standard doesn't specify requirements for written procedures
- Guidance
 - "Tribal knowledge" is evidence of a procedure even if it is not written.
 - A written procedure that people don't know about or don't follow isn't particularly valuable.

15

Conduct Yourself as You Have Described ^(1/2)

1. You have to have a QI onsite.
 - A QI is defined in Section 8.3
 - Meet experience requirements
 - Pass method-specific qualification exams
 - ***Sign a statement agreeing that all supervised tests conformed to QM and ASTM D7036-04 in all respects.***
 - A QSTI is not always a QI.
 - A QSTO can be a QI.
 - QI claim must be supported with records.

16

Conduct Yourself as You Have Described ^(2/2)

2. Prepare and follow a site-specific test plan for each test project as described in 12.3.
 - Test plan, along with QM, is central to evaluating conformance.
3. Conduct QS program audits, reviews, and assessments.
4. Collect performance data.
5. Keep records.

17

Get Better at What You Do ^(1/2)

1. Collect and Evaluate Performance Data
 - Feedback from clients, observers, regulators
 - Internal & external audits
 - Proficiency test programs (audit samples)
 - Other data that provides objective documentation of data quality

18

Get Better at What You Do ^(2/2)

2. Act on Performance Data

- Standard requires a corrective action policy and procedure consisting of:
 - Cause analysis
 - Selection & implementation of corrective action
 - Monitoring of corrective actions
 - Additional audits when issue cast doubts on AETB's compliance with its own policies or procedures or the standard

19

Be Able to Prove Your Claims ^(1/2)

- Source must obtain:
 - Certificate of accreditation/interim accreditation or self-certification letter.
 - Name & contact info for AETB
 - Name of each QI on-site
 - Date of qualifying exam and exam provider

20

Be Able to Prove Your Claims ^(2/2)

- Source is advised that this info may be helpful:
 - AETB's Quality Manual
 - Internal & external audit data
 - Performance Data, as defined by the standard, plus implemented corrective actions
 - Training records for all onsite personnel, including QIs
- AETBs that cannot prove claims may be listed as offenders

21

Progress is impossible without change,
and those who cannot change their minds cannot
change anything.

George Bernard Shaw

22