

Virginia Division of Consolidated Laboratory Services

**ENVIRONMENTAL LABORATORY CERTIFICATION PROGRAM
(1VAC30-45 and 1VAC30-46)**

GUIDANCE DOCUMENT

**APPLICABILITY OF MATERIALS SPECIFICATION TESTING FOR
AIR QUALITY COMPLIANCE**

April 26, 2012

The Division of Consolidated Laboratory Services (DCLS) is issuing the following guidance concerning the applicability of materials specification testing for air quality compliance under 1VAC30-45 and 1VAC30-46. DCLS is exempting materials specification for air quality compliance from the definition of environmental analysis in both 1VAC30-45 and 1VAC30-46.

The Department of Environmental Quality's Air Division (DEQ-Air) requires permittees to monitor or measure a number of parameters or analytes to demonstrate compliance with pollutant standards. Permits may not specifically require analytical methods. The permits may require instead that a fuel, coating, or material meet documented specifications.

While these specifications are an important component of determining compliance with the air quality laws and regulations carried out by DEQ-Air, certification or accreditation of the laboratories that perform materials specification testing is generally not performed by the NELAC Institute's (TNI) accrediting bodies. DCLS has determined that the Virginia Environmental Laboratory Accreditation Program (VELAP) will not certify or accredit this type of testing as well.

Fuel specification testing discussed in detail below is one example of material specification testing.

Fuel Specification Testing

Fuel specification testing as required by Virginia's air quality laws and regulations is not applicable under VELAP. Environmental laboratories that perform these tests are not required to become certified or accredited under 1VAC30-45 or 1VAC30-46 for this category of testing.

Fuel specifications requirements in air quality permits are generally satisfied with product certificates that specify the data required by the permits. These certificates are provided by the suppliers of fuel to the permittees. The product certifications document the information required by the permit such as sulfur content, Btu content, or whether the fuel is a particular fuel type such as No. 2 fuel oil. The fuels covered by the permits include but are not limited to fuel oil, coal, natural gas, or distillate oil.

DEQ-Air issued guidance on March 16, 2012 that allows product certifications to be accepted in lieu of laboratory testing. When no product certification is provided to a permittee from a supplier, DEQ-Air may require laboratory analysis of a fuel sample. In other cases DEQ-Air requires sampling and laboratory analysis to be performed for compliance reasons. Sampling and analysis of fuel is required in a minimal number of cases according to DEQ-Air. VELAP will not require certification or accreditation of those laboratories performing fuel specification testing in those instances when DEQ-Air requires laboratory analysis to be done.