Part 75 CEMS Desk Audit Guide

Clean Air Markets Division
U.S. EPA
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Contents

Definitions

CAMD is EPA's Clean Air Markets Division. The division is responsible for implementing 40 CFR part 75.

CEMS, or continuous emission monitoring system, is the equipment required by 40 CFR part 75 to sample, analyze, measure, and provide a permanent record of emissions or stack gas volumetric flow rate.

Desk audit is a virtual examination—conducted via email, video conference, and/or telephone—of a facility's emissions monitoring system(s) and practices to ensure they are consistent with 40 CFR part 75 requirements. It is also an opportunity to EPA personnel to learn about and share suggestions and information about good practices for part 75 monitoring, reporting, and recordkeeping.

ECMPS is the Emissions Collection and Monitoring Plan System—a software package that facilities must use to submit monitoring, QA, emissions, operations, and compliance reports to EPA to comply with 40 CFR part 75 and select federal and state regulations (e.g., 40 CFR part 63 subpart UUUUU (MATS), the Regional Greenhouse Gas Initiative (RGGI)).

Facility is a power plant or industrial facility that is subject the monitoring, reporting, and recordkeeping requirements of 40 CFR part 75.

Part 75 is a series of regulations and policies governed by part 75 of chapter 40 of the Code of Federal Regulations (40 CFR part 75). In addition to the regulations, EPA has published technical questions and answers to aid in implementation and compliance of the regulations.

Standard audit questions is a list of questions that are sent to the facility in advance of an audit. The questions can be found in appendix B.

About this guide

This guide details the procedures that EPA's Clean Air Markets Division (CAMD) uses to conduct desk audits. While this guide was developed for CAMD personnel and contractors to use when planning and conducting desk audits, EPA published this guide to serve as an example for EPA regions and state, local, and tribal air agency auditors and inspectors. Industry personnel may also find the material useful for understanding the EPA audit process and for internal quality management activities (e.g., conducting internal audits).

EPA welcomes feedback on this guide and experiences with desk audits. Please submit feedback through the Contact Us form on the EPA Clean Air Markets Division website: http://www.epa.gov/power-sector.

1 EPA's part 75 audit program

The part 75 audit program includes several components beginning with mandatory quality assurance activities, including calibration error tests, linearity tests, relative accuracy test audits (RATAs), leak checks, flow-to-load tests, among others.[1] These quality assurance tests must be conducted with EPA Protocol gases that are provided by vendors that are periodically audited under the Protocol Gas Verification Program (PGVP) to ensure that EPA protocol gases meet the accuracy requirements of part 75.[2]

After data are collected at the facility, those data are evaluated by electronic checks built into the Emissions Collection and Monitoring Plan System (ECMPS) software. The software includes thousands of electronic checks that look for errors (e.g., mathematical errors), missing information (e.g., QA test results), inconsistencies (e.g., a CEMS-equipped unit reporting alternative monitoring method data), and more. For each submission, the ECMPS software provides a feedback report for the facility that includes error and informational messages.[3]

After the emissions data are successfully submitted to EPA at the end of each quarter, EPA staff perform additional quarterly electronic checks to identify data that may be consistent with the part 75 requirements but are unexpected (e.g., repeating values for extended periods of time, systematic carbon dioxide (CO_2) concentration decreases that might indicate a monitoring system leak, statistical anomalies). When unusual data are identified, EPA analysts work with the facilities to investigate the data, identify issues that have caused the unusual data, and, if necessary, resubmit data. These checks can also identify facilities that are candidates for on-site or desk audits. EPA staff also conduct periodic analyses and reviews of the data submitted to EPA, sometimes cross checking the data with other data sources (e.g., information submitted to the Energy Information Administration (EIA)).

The final element of the audit program is periodic on-site or desk audits of a facility's monitoring system(s), quality assurance procedures, and documentation and recordkeeping. The goal of the on-site or desk audit is to assess a monitoring system's performance and a facility's compliance with monitoring requirements.

The EPA audit program also encourage good monitoring practices by raising plant awareness of monitoring requirements.

[1] For more information about the required quality assurance activities, refer to § 75.21, appendices A and B to part 75, and the Plain English Guide to Part 75.

[2] For more information about the PGVP, refer to § 75.21(g) and the PGVP website: https://www.epa.gov/power-sector/business-center-and-emissions-monitoring-contactshttps://www.epa.gov/power-sector/protocol-gas-verification-program.

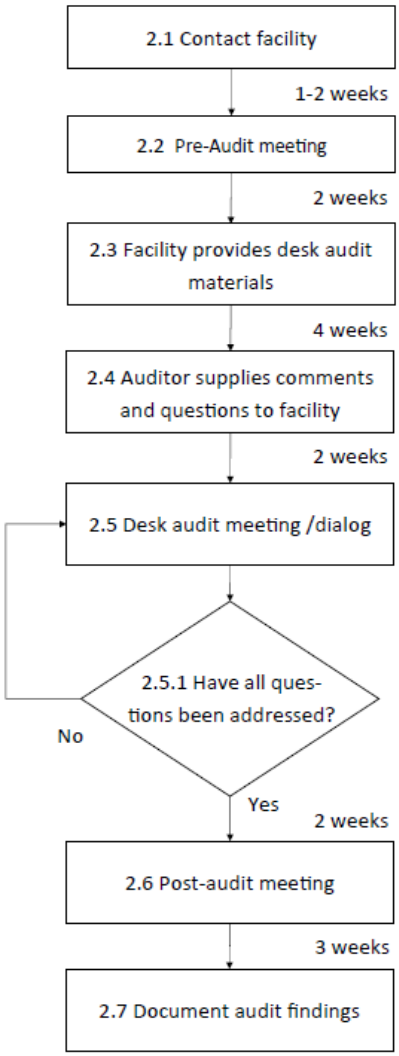
[3] For more information about the electronic checks in ECMPS, refer to the check specifications website: https://www.epa.gov/power-sector/technical-information-reporting-data#check-specs.

2 Desk audit process

Figure 1 illustrates the process for a desk audit along with time estimates between each step. EPA selects facilities and monitoring systems for audits based on a) ECMPS submission feedback reports, b) quarterly electronic data check results, c) data analyses results, or d) random selection.

Once a facility and the monitoring system(s) is identified for an audit, the process begins with the EPA auditor contacting the facility to notify them of the audit, arrange a pre-audit meeting, and request materials. After the auditor reviews the materials, the auditor should send comments and questions to the facility and schedule the desk audit meeting to discuss the comments and the facility's responses to questions. During or following the desk audit meeting, the auditor may request additional information. Following the review of all materials, including the facility's responses to questions, the auditor should begin documenting their findings and schedule a post-audit meeting with the facility.

Figure 1: Audit process flow chart



2.1 Contact and material request

The EPA auditor should communicate with the facility monitoring contact via email to a) inform them that the facility has been selected as a desk audit candidate, b) schedule an initial meeting, c) request the information listed in the documentation and photo check sheets, and d) request responses to the standard audit questions.

2.1.1 Desk audit checklists and auditor tables

Appendices A, B, and C of this guide provide materials to guide the information request and audit:

- Appendix A includes the list of documents and photos that the EPA auditor should request. The auditor should provide the checklists to the facility to aid in collecting and submitting the requested information.
- Appendix B contains the standard audit questions. The table has three columns: (a) questions, (b) facility response, and (c) auditor observations. The auditor should provide the tables to the facility, asking them to complete the second column with their responses to the questions in the first column.
- Appendix C contains three auditor review tables: (a) data review, (b) document review, and (c) photo review. Each of the tables has three columns: (a) what to review, (b) what to check/look for, and (c) auditor observations. The auditor can use these tables as a guide to conduct the audit. Note that the document review table includes a prompt for 'days of interest'. To prepare for the pre-audit meeting, the auditor should identify any activity or data periods that they want to review with the facility (e.g., dates and hours of maintenance activities, QA activities, or unusual activity).

2.2 Pre-audit meeting

During the pre-audit meeting, the EPA auditor should explain to the facility why the monitoring system(s) is being audited, what to expect from the audit, and the timeline for the audit. The facility can use this opportunity to ask questions and express any concerns about the audit or timing.

The auditor can use the following agenda template for the pre-audit meeting with facility staff:

- Introductions
- Reason(s) facility selected for audit
- Identification of monitoring system(s) that will be the focus of the audit
- Audit principles
    - Review of the facility's implementation of part 75 and ensure the highest data quality possible under part 75
    - Not meant to be intrusive or disruptive to the facility operations or sampling system
- Audit process and timeline
    - Describe Figure 1
    - Explain the audit may take 12 to 16 weeks to complete from initial communication to the audit close out meeting (Figure 1 provides a step-by-step timeline)
    - Explain that facility staff may have an opportunity to review the draft audit report and provide comment(s)

- Audit communication
    - Identify communication tool(s) (e.g., Microsoft Teams, Zoom, phone) (facility staff may be restricted from using some tools due to security constraints)
    - Identify information exchange tool(s) (e.g., a SharePoint, email) (facility staff may be restricted from using some tools due to security constraints)
    - Explain Photos or documents from facility should not contain confidential business information (the materials may be subject to FOIA)
    - Identify points of contact at EPA and facility
- Checklist of documents and photos (appendix A)
- List of standard audit questions (appendix B)
- Questions and answers
- Next steps
    - Agree on a date when audit documents and photos are due
    - Schedule the desk audit meeting

2.3 Facility provides desk audit materials

The auditor should send the document and photo request checklists (appendix A) and the standard audit questions (appendix B) to the facility and request **up-to-date** documents (e.g., monitoring plan) and photos.[4] Any documents and photos provided to the EPA could be subject to FOIA requests so the auditor should instruct the facility to ensure that they do not provide any confidential information. The audit should not be intrusive or disruptive; the auditor should instruct the facility not to disrupt the monitoring system(s) or operations to retrieve photos or documents.

2.4 Auditor supplies comments and questions to facility

After reviewing the information from the facility, the auditor should compile comments and follow-up questions to the facility in a single email or document and send them to the facility contact. The auditor can use the table format below to provide the questions and provide space for responses.

Table 1: Follow-up questions table

	Questions	Facility response	Auditor notes/observations
1	Fill in questions here		
2			
3			

2.5 Desk audit meeting/dialog

During the desk audit meeting, the auditor and facility should review a) the auditor's initial comments, b) the facility's response to the auditor's initial questions, and c) additional questions that arose during the auditor's review of the materials. The meeting is also an opportunity for the facility to ask questions of the auditor.

[4] The auditor should share editable formats of the checklists and standard audit questions. EPA has published Microsoft Word versions of appendices A and B.

During the meeting, the auditor should decide if any additional information is needed to provide clarity or address remaining questions. If additional responses or other follow up is required, those communications may be via email with the facility contact.

The auditor can use the following agenda template for the desk audit meeting with facility staff:

- EPA comments and follow-up questions
- Information from data evaluation sheets
- Questions and answers
- Next steps
    - If necessary, agree on a date when additional information is due
    - Schedule the post-audit meeting

2.6 Post-audit meeting

During the post audit meeting, the auditor should present their findings and recommendations to the facility. If there are any decisions during the post-audit meeting, the auditor should document the decisions and keep the documentation with the audit files.

The auditor can use the following agenda template for the post-audit meeting with facility staff:

- EPA's initial audit findings
- Recommendations and corrective actions
- Questions and answers
- Next steps
    - If necessary, agree on a timeline for facility to provide comments on draft audit report (e.g., within two weeks of receipt)
    - If necessary, agree on a timeline for the facility to complete suggested corrective actions

2.7 Document audit findings

The auditor should draft the findings in an audit report and email a copy of the report to the facility contacts and state CEMS contact. The final report and, if applicable, the corrective actions resolutions should be added to the audit file and the entire file logged in the Emission Monitoring Branch's knowledge management system.

2.7.1 Desk audit report

The desk audit report should include the following sections:

- Title
- Audit information
    - Facility: name, ORIS, and location
    - Facility contact: plant contact name
    - Dates: audit start and end dates
    - EPA auditors: auditor name(s) and organization(s), identify the lead auditor
    - EPA report reviewers
- Audit overview

    - Description of facility and system(s) audited
    - Reason(s) facility was selected for a desk audit
    - Description of desk audit procedures
    - Description of data or information provided by facility (e.g., copies of logbooks)
- Audit results
- Recommendations for improving monitoring system accuracy and/or reliability
    - Good practices
    - Corrective actions
- Additional information
    - Images or other supporting evidence
    - Follow-up questions and responses
- Signature: lead auditor name, title, signature, and date

2.7.2 Corrective actions resolution

If the desk audit report includes recommended corrective actions, the EPA auditor should log the information in the follow up actions list. At the post-audit meeting, the facility should have proposed a timeline for completing the corrective actions. The EPA auditor should review any submissions or follow up with the facility to verify that the corrective actions have been completed. After they are completed, the auditor should write a brief memo for the audit file and the Emission Monitoring Branch's knowledge management system.

Appendix A: Document and photo request checklists (provide lists to facility)

Document request checklist

1. QA/QC plan
2. Example CEM maintenance logbook entries
3. Schematic diagram(s) covering:
    a. Overview of the CEMS layout and entire gas handling system with ID's and locations (including height)
    b. Stack height and interior diameter identified at location of flow monitor(s)
    c. All controls, stacks, ducts, and bypass stacks or ducts, including identification of groups of units using common stack
4. List of applicable petition requests and responses
5. Most recent RATA test reports in a pdf format
6. Results of the most recent annual span, range, MPC and MEC evaluation
7. If a single load flow RATA was conducted, provide the results of load analysis
8. Calibration gas certificates for daily and quarterly linearity bottles in service
9. Daily calibration report
10. Recent interference check report
11. Minute data during the most recent linearity check and gas RATA(s)
12. Daily Check Sheet(s)
13. Periodic check sheets in use (daily, weekly, monthly, etc)?

Photo request checklist

1. Inside the CEM Shelter (as much coverage as possible)
2. Daily Calibration gases in service and linearity check bottles used most recently (if available)
3. Cylinder ID engraved on bottle
4. Pressure gauge regulators
5. Calibration lines in an area with a high risk of condensation (areas of the sample line that are not heat traced, areas of the sample line that enter the CEM shelter, anywhere there is a change in temperature, bends in the line)
6. Calibration gas lines leading into the CEM shelter
7. Screenshot or print out of cylinder IDs entered in the DAHS
8. Analyzers
9. Serial number of analyzers
10. Sampling flow rate dial (rotameter)
11. Vacuum system with vacuum gauge reading (dilution air)
12. Umbilical line
13. Entering the CEM shelter
14. Sample line leading from the probe to the umbilical line (possibly within the probe box)
15. Sample probe serial number (this is an optional photo, only provide if easily available)

Appendix B: Standard audit questions

	What to ask	Facility Response	Auditor observations
1	What type of maintenance activities have been conducted on the CEM systems that required an event record to be submitted to ECMPS? Look back: 8 calendar quarters		
2a	What types of daily maintenance activities are conducted to ensure the CEM systems are working properly?		
2b	Do you have a daily check sheet? (requested in documentation review)		
2c	Are these activities documented in the QA/QC manual?		
3a	Has the gas probe been moved or replaced? Look back: Since the most recent recertification of the gas probe?		
3b	Has the sample umbilical line or any gas analyzers been replaced? Look back: Since the most recent recertification of the gas probe		

	What to ask	Facility Response	Auditor observations
3c	Were the stack flow monitors moved or replaced? Look back: Since the most recent recertification of the gas probe		
3d	Were the polynomial coefficients changed (e.g. volumetric stack flow monitor, k factors, moisture monitor)? Look back: Since the most recent three level flow RATA		
4a	Can you provide an example of what QA activities occur after certain maintenance activities?		
4b	Is the facility familiar with Q&A Technical question 12.10 and if so, does the facility perform and report the recommended tests in accordance question 12.10?		
5a	Is the measured data collected by a DAHS corrected in any way (excluding bias adjustment factors and dilution ratios as applicable) prior to being reported (e.g. scaling factor)?		
5b	If yes, how is the data corrected from measured to reported (e.g. volumetric stack flow corrected to standard conditions)? Please provide a sample calculation with short explanation if applicable.		
6	How do you ensure that DAHS is collecting and reporting information correctly?		

	What to ask	Facility Response	Auditor observations
7a	What type of preparation happens for RATAs, linearity checks etc.?		
7b	Are any adjustments made prior to RATAs or linearity checks etc.?		
7c	Besides the Bias Adjustment Factor are any adjustments such as temperature and pressure corrections used to report emissions data included in the raw CEM data used for comparison purposes with the reference method data?		
8a	Describe the general procedures used when replacing calibration gas bottles.		
8b	How do you update bottles with new concentrations in the DAHS?		
9	How do you ensure QA/QC test deadlines (e.g. grace periods) are tracked properly to avoid data invalidation?		
10	Do you have any petitions responses issued from EPA? If yes, what are the general conditions of the petition response and how do you ensure they are being followed?		

Appendix C: Auditor review tables

Data review table

	What to review	What to check	Auditor observations
1	Check missing data by MODC	Were appropriate MODCs used in the hourly data? If 53-55, were they approved through a petition response issued by EPA? Identify lengthy (e.g. greater than 24 hours) periods of substitute data by MODC. MODC QA Hours = 01, 02, 03, 04, 14, 16, 17, 19, 20, 21, 22, 26, 45, 47, 53 and 54 MODC Substitute Hours = 5-13, 15, 18, 23-26, 46 and 55 Record of control parameters: Are there add on controls? Was standard missing data used? Or were MEC or MPC applied? If MEC was used, were they operating in the bounds of normal operation as specified in the QA/QC plan or hard copy monitoring plan? Lookback: 12 quarters	
2	Use the spread sheet found at this link in the "related information" box to create time graphs, scatter plots, span-range check plots, and control charts. (Using this spread sheet is optional but it offers guidance)	Review time graphs for: 1. Trends or shifts in the hourly emissions data 2. Outliers in the hourly data and daily averages 3. Excessive daily calibration failures or any trends Review scatter plots for	

	What to review	What to check	Auditor observations
		1. Outliers in the scatter plots 2. Substituted data matches trend of measured data Review span-range plots for 1. Appropriateness of Span and Range 2. Excessive exceedance of MPC or excessive data outside 20-80% of range Review controls charts for 1. Out-of-bounds CO_2 control charts Lookback: 4-12 quarters	
3	List of completed tests with pass or failed status. Can be found in FACT.	Identify failed tests and discuss what actions were taken. Were any tests aborted? If so why? Identify failed QA checks (RATA, linearity checks, daily calibrations, flow to load etc.). Tests are available through FACT or you can contact your analyst. Lookback: 12 quarters	

Document review table

	What to review	What to check	Auditor observations
1	QA/QC plan	Revision dates, signatures from the DR or environmental manager, and dates/revision numbers if it has been revised. Does the QA/QC plan contain the minimum data elements specified in Appendix B section 1 – 1.4.3? Does the QA/QC plan describe procedures of each QA test? Does the QA/QC identify how the dilution air system is being maintained? Include follow up questions to identify if QA/QC is being followed.	
2	Request for CEM maintenance logbook entries	Check for date, time, initials on logbook. Check for completeness and clarity of the entries. Check maintenance activity entries are entered into the CEM logbook. Ask for entries that correspond to lengthy (e.g. greater than 24 hours) missing data periods, maintenance events (e.g. replacement of analyzers, umbilical lines, changes to polynomials etc).	
3	Most recent hardcopy RATA test reports in a pdf format.	Review test procedures, stratification testing (if	

	What to review	What to check	Auditor observations
		applicable), compare with results reported to ECMPS test reports. Determine how many points were sampled for each gas reference method run. Note that if only one sample point was used then each gas RATA must be preceded by a 12-point stratification test and pass the acceptance criteria for each parameter in accordance with the procedures found in 40 CFR 75 Appendix A §6.5.6(b)(4) and 6.5.5.3(b). Review the one-minute CEM reference data to see if it includes any calculated data vs measured data. Is the one minute data valid used for each RATA test run valid?	
4	Results of the annual span, range, MPC and MEC evaluation.	Determine if periodic span, range, MPC and MEC evaluations have been conducted in accordance with the provisions of Appendix A §2.1.1.5 - §2.1.4.3. If performed, review the results of the annual span, range, MPC and MEC evaluation to determine if adjustments as needed are being made in accordance with Appendix A §2.1 - §2.1.4.3	

	What to review	What to check	Auditor observations
5	If a single load flow RATA was conducted, provide the results of load analysis.	Are the results in accordance with Appendix B §2.3.1.3(c)(3)?	
6	Calibration gas certificates for daily and quarterly linearity bottles in service.	Are any calibration gas bottle in service expired? Are they produced by a PGVP participant?	
7	Print out of a recent interference check	Ask for days of interest, for example the most recent day or days during maintenance or QA activities (e.g., date of linearity). Find dates of data substitution or maintenance activities from the logbook or FACT.	
8	Minute data during the most recent linearity check and gas RATA(s).	Does the one-minute data justify or support the reported data?	
9	Maintenance Activities Documents • Daily Check Sheet • Periodic check sheets in use (daily, weekly, monthly)?	Are they following the QA/QC plan? Are there issues that are being recorded on the check sheets? Do they adequately reflect the maintenance done on a day-to-day basis?	
10	Monitoring Plan	Check that the monitoring plan is up to date and especially the primary and secondary fuels, monitor information serial numbers and formulas, control information is up to date, load and operating level information, monitoring defaults, plant attributes, etc.	

	What to review	What to check	Auditor observations
11	A schematic diagram identifying entire gas handling system (Document request 3)	Check to verify that the information provided in the monitoring plan matches the information in the provided schematic diagrams. Specifically check: Unit, monitors, controls, stacks/ducts (bypass stacks or ducts), and pipes The schematic diagram must depict stack height (and interior diameter of the stack/duct where the flow monitor is located) and the height of any monitor locations. Comprehensive and/or separate schematic diagrams shall be used to describe groups of units using a common stack.	
12	Existing Part 75 petition responses	Verify existing petition responses are applicable and the requirements are being met.	

Photo review table

	What to review	What to look for	Auditor observations
1	Inside the CEM Shelter (as much of the room as possible)	Use this photo to get a general understanding of what the facility has and what it looks like.	
2	Daily Calibration gases in service and linearity check bottle used most recently (if available) • Cylinder ID engraved on bottle • Close up Pressure gauge regulators for any bottles that are in service and open • Calibration lines in an area with a high risk of condensation • Calibration gas lines leading into the CEM shelter (please include at least one close photo of the line if possible) • Screenshot or print out of cylinder IDs entered in the DAHS	Do the cylinder IDs engraved on the bottle match the certification sheet and the IDs entered in the DAHS? Check that linearity cylinder IDs matches what is reported on the last linearity check. Do the expiration dates match the certification sheet? Is there any damage, moisture or fouling present to the calibration lines or the sample lines?	
3	Analyzers • Serial number • Sampling flow rate dial • Vacuum system with vacuum pressure reading	Check that the serial number matches the serial number in the monitoring plan. Match the vacuum pressure and flow rate with the QA plan. Does the rate meet the specified requirements in the QA plan?	
4	Umbilical line • Entering the CEM shelter	Is there any damage, moisture or fouling present to the lines?	

	• Sample line leading from the probe to the umbilical line (possibly within the probe box)		
5	Sample probe serial number (This is optional photo only provide if easily available)	Check that the serial number matches the serial number in the monitoring plan.	

Appendix D: Email templates

Initial contact email to facility

Dear [facility Contact],

The US EPA Clean Air Markets Division (CAMD) - Emissions Monitoring Branch (EMB) implements the emissions monitoring and reporting of affected facilities under 40 CFR Part 75. As part of the part 75 implementation, EMB has developed a CEMS desk audit procedure. [Facility name and ORIS] has been selected by EMB as a candidate for a Part 75 CEMS desk audit. We would like to schedule a pre-audit meeting (approximately 1-2 hours) to discuss what to expect and to address any questions that you may have. Are you available to meet the week of [date]?

If it not a good week for the pre-audit meeting, it is possible to move it to the following week?

Topics that will be included in the audit are listed below.

- Data review
- Document review
- Photo or video review
- Standard audit questions

For more information about the audit process please refer to the Part 75 CEMS Desk Audit Guide on EPA's website.

I have attached files that list (a) the documents and photos that we are asking you to provide, and (b) questions that are asking you to answer in the second column of the table.

Actions items:

1. Reply to this email with a date for the pre-audit meeting. Nothing will be due at this meeting.
2. Compile and provide the documents and photos listed in the document and photo request checklist. During the pre-audit meeting, EPA will discuss options for submitting the documents and photos.
3. Answer the standard audit questions and return the document to EPA.

If you have any questions, feel free to call or email me.

Thank you for your time and cooperation.

Invitation for state CEMS contact to join the audit

Hello all,

[Facility name, ORIS, and units], a facility in your state/region has been selected as a part 75 CEMS desk audit candidate. We have contacted the facility to schedule a pre-audit meeting to go over what to expect during the desk audit. We would like to invite you to join the pre-audit meeting on [date and time] and follow the audit process if you would like.

The pre-audit meeting will be used to discuss the overview of the audit, determine the best form of communication, introduce the audit sheets, discuss scheduling, and address any questions the facility or you may have.

Topics that will be included in the audit are listed below.

- Data review
- Document review
- Photo or video review
- Standard audit questions

For more information about the audit process please refer to the Part 75 CEMS Desk Audit Guide on EPA's website.

If you have any questions, call me or please reply to this email.

Replying to the facility with follow-up questions email template

Hello [facility contact],

We have completed reviewing the documents, photos, and reported data that you and your colleagues provided. The attached document contains some follow-up questions. We do not expect you or your colleagues to answer these questions before the (date) audit meeting but would like to use this meeting to discuss the questions and the timeline for how long your team will need to provide a response.

Audit meeting agenda:

- EPA comments and follow-up questions
- Information from data evaluation sheets
- Questions and answers
- Next steps
  - Agree on a date when additional information is due
  - Schedule the post-audit meeting

If you have any questions, please let us know.

Requesting post-audit meeting

Hello [facility contact]

We have completed reviewing the answers to the standard audit and follow-up questions and would like to schedule the post audit meeting to go over the audit results and suggestions. Do any of the suggested dates below work for your team?

- Date 1
- Date 2
- Date 3

If none of these dates work, please provide some alternatives.

Post-audit meeting agenda:

- EPA's initial audit findings
- Recommendations and corrective actions
- Questions and answers
- Next steps

Appendix E: Part 75 information and resources

EPA provides documents that can be used to reference detailed information. Some of these documents include:

- The part 75 regulation (40 CFR part 75): https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-75
- Technical questions and answers: https://www.epa.gov/system/files/documents/2022-04/part_75_emissions_monitoring_policy_manual_10-18-2019.pdf
- These questions and answers, formerly titled The Policy Manual, include a series of question and answer intended to ensure that the part 75 provisions are applied consistently for all facilities affected by the regulation. EPA regularly adds, updates, and retires questions.
- Part 75 plain English guide: https://www.epa.gov/sites/default/files/2015-05/documents/plain_english_guide_to_the_part_75_rule.pdf
- This guide is designed to provide an overview of the part 75 monitoring, reporting, and recordkeeping provisions.
- Reporting instructions for the Emission Collection and Monitoring Plan System (ECMPS) software: https://www.epa.gov/power-sector/ecmps-reporting-instructions
  These instructions describe each data element that a facility must record and report to EPA for part 75 reporting requirements.
- Part 75 field audit manual: https://www.epa.gov/power-sector/field-audit-manual
  This manual outlines the procedures that EPA recommends for conducting an on-site audit of a part 75 monitoring system.