

PA-DEP Laboratory Accreditation Program	Limited Use ATP Approval Application FAQ
Laboratory Compliance Assistance	Revision 0
	Date: October 25, 2012

## **Limited Use ATP Approval Application FAQ**

**Disclaimer:** The information in this FAQ does not supplant the provisions of the USEPA ATP Procedures, the USEPA approved methods, 40 CFR, Part 141 or Part 136, or 25 Pa Code Chapter 252. This document is a tool to help laboratories understand and comply with the application procedure established by the USEPA Region 3 for request to use analytical methods for which the USEPA's Engineering & Analysis Support Branch has granted interim approval. If there is any disagreement between the contents of this document and any of the USEPA or Department's laws, regulations, or methods, the laws, regulations and methods shall prevail.

**Question: How do I obtain approval to use a Limited Use ATP Method?**

**Answer:** A laboratory that wishes to obtain approval to use a method deemed a "Limited Use ATP Method" must submit a completed "Limited Use ATP Approval Application" to the Department along with a copy of the laboratory's SOP, as required by the USEPA Region 3.

**Question: Is the Limited Use ATP Approval Application the same as an application for accreditation?**

**Answer:** No. A laboratory must submit a separate application for accreditation directly to the Department's Laboratory Accreditation Program ("LAP"). The accreditation request may be submitted as an "Add FOA" request or at the same time the laboratory submits its renewal application. These accreditation applications must be submitted in hard-copy to the LAP and must include:

1. The appropriate fee (either the renewal fee or Add FOA fee)
2. Copy of the laboratory's SOP for the requested method/analyte combination
3. Demonstration of Capability Studies

**Question: Is "approval" different from "accreditation"?**

**Answer:** Yes. The USEPA "approves" the use of the ATP. The Department's Laboratory Accreditation Program ("LAP") grants "accreditation" to test compliance samples. Testing of samples can only begin after the laboratory has been granted accreditation by the LAP.

**Question: Can I apply for accreditation from the LAP before I obtain approval from the USEPA Region 3?**

**Answer:** Yes. You may submit your application for accreditation for a Limited Use ATP Method at the same time you submit your Limited use ATP Approval Application.

**Question: Do I need to obtain accreditation for the Limited Use ATP method before beginning testing?**

**Answer:** Yes. The USEPA Region 3's decision to approve the use of a Limited Use ATP Method does not mean that you have been authorized by the Department to analyze compliance samples. You must obtain accreditation from the LAP before you may analyze compliance samples.

**Question: Why does the Limited Use ATP Approval Application require the permit numbers for which I will be testing samples?**

**Answer:** This is a requirement of the USEPA Region 3. The laboratory that wishes to obtain approval to use a Limited Use ATP Method must complete the application and indicate the applicable permit numbers for which the laboratory will be testing compliance samples.

**Question: What if I do not know all of the permit numbers?**

**Answer:** Include all of the permit numbers that you do know.

PA-DEP Laboratory Accreditation Program	Limited Use ATP Approval Application FAQ
Laboratory Compliance Assistance	Revision 0
	Date: October 25, 2012

**Question: After I obtain approval to use a Limited Use ATP Method, do I need to submit another application before I begin testing for a permittee that was not included on the original application?**

Answer: No. Once a laboratory gains approval for one or more permittees, the laboratory is not required to submit another application to begin testing of a new discharge.

**Question: Item #7 of the Application states that I must include “justification” for use of a Limited Use ATP Method instead of using a method listed in the CFR, what does this mean?**

Answer: Region 3 would like to know why a laboratory wants to use the ATP method. An example of a justification might include any of the following reasons:

1. The ATP method is easier to use and yields results equivalent to the methods in the CFR.
2. The ATP method is less expensive to use and yields results equivalent to the methods in the CFR.

**Question: To whom do I submit the Limited Use ATP Approval Application?**

Answer: The application and copy of the SOP must be provided to the general e-mail account for the Department’s Laboratory Accreditation Program at [eplabaccredit@pa.gov](mailto:eplabaccredit@pa.gov). Applications submitted to other e-mail addresses will not be accepted. If you do not have an e-mail address or access to the internet, you must contact your accreditation officer for further instructions.

**Question: What happens after I submit my Limited Use ATP Approval Application to the Department?**

Answer: The Laboratory Accreditation Program will review the application for completeness. If the application is incomplete you will be notified and provided an opportunity to re-submit the application. The Department will forward all complete applications to the USEPA Region 3 for review. You will be copied on this e-mail.

**Question: To whom should I direct questions regarding the progress of my Limited Use ATP Approval Application?**

Answer: All questions regarding your application must be directed to the USEPA Region 3 ATP coordinator, Charlie Jones, after the Department forwards your application to Region 3.

**Question: How will I be notified about the outcome, approval or denial, of my Limited Use ATP Approval Application?**

Answer: USEPA Region 3 makes all decisions regarding the approval or denial of applications for Limited Use ATP methods. Once Region 3 makes a decision regarding your application, the Department will be notified of that decision. The Department will then notify you of the USEPA Region 3’s decision.

**Question: If my application for approval of a Limited Use ATP method is denied, what are my options?**

Answer: All questions or appeals of the USEPA Region 3’s approval or denial of a request to use a limited Use ATP method must be directed to the USEPA Region 3’s ATP coordinator, Charlie Jones.