

Stationary Source Audit Sample (SSAS) Committee Meeting August 11, 2008

Associate members present:

Maria Friedman
Wayne Whipple
Richard Swartz
Candace Sorrell
Ken Eichelmann
Ray Merrill
Shawn Kassner
Gregg O'Neal
Amy Hurd

TNI Staff:

Ken Jackson
Jane Wilson

Ken Jackson welcomed the group and explained his role in getting the committee started. He described role of the new committee in relation to EPA's Stationary Source Audit Program (SSAP) and its externalization to a new TNI program. The Committee will not address laboratory testing of air proficiency testing samples, which would be under the scope of the Proficiency Testing Expert Committee.

The SSAS Committee is not officially formed yet – associate committee members have been meeting to get the committee started. Ken has tasked the group with providing a list of additional names for the committee this week. The committee will need to represent a balance of interests as required by TNI policy. Self introductions were given by the participants.

Ken reviewed some of the actions taken during the July 21 conference call. Confusion about the working name of the committee was a concern – the group had settled on Stationary Source Audit Sample Expert Committee. The group has reviewed the TNI standards policies and the expert committee operations SOP. With respect to timing, externalization of the EPA program could be complicated if a new standard is not ready by Oct 2009 when funding for the program is discontinued.

The July 21 meeting summary was approved with editorial corrections.

Review of proposed charter

It was agreed that this committee should not address anything to do with laboratory proficiency testing (PT) frequency. Audit samples do not have a regular performance frequency the frequency is “on demand”. There may also need to be some coordination with the Field Activities Committee. The standards developed by the SSAS committee will not be requirements for labs, but for the facilities getting the tests done, organizations providing the audit samples, and those providing oversight of audit sample production. The group discussed whether there is

an intent to test the people doing the test on the stack, as well as the lab doing the testing of the sample. Some of these issues cross over into the FAC and PT committees. The SSAS standards would not be used for accreditation purposes. The scope of the committee should not extend to include laboratories, and should not include TNI accreditation of the stack tester.

Frequency of audit sample testing is as often as the state requires or it could be stated in terms of availability by the audit sample providers. Audit samples are an event sample, not time driven. Right now the EPA program works on two week to one month testing notices – this is the manufacturing turnaround for the audit sample providers.

The current EPA requirements will be made available to committee. The federal requirements will still need to be enforceable under the new program. The new regulation being drafted by EPA will have audit sample requirements in the General Provisions. It will be the responsibility of the source being tested to arrange for the audit samples.

PT provider acceptance limits are being discussed by the Fields of Proficiency Testing (FoPT) subcommittee of the TNI PT Board. Note: The FoPT subcommittee decisions impact the accuracy and precision required of the SSAP provider. The FoPT subcommittee has an SOP for how to determine the limits. EPA has determined several concentration ranges, but audit samples cannot be manufactured for every range. Acceptance criteria need to be appropriate to the audit samples.

It will also need to be determined what congeners are required to be analyzed in audit samples, such as for dioxin analysis.

The SSAS standards should address how the resulting data will be accessed. Will the EPA database transition to the TNI National database?

The SSAP standard also needs to stipulate that the audit sample provider cannot provide the same audit sample twice for testing by the same laboratory. While the source orders the audit sample, they must also specify who is analyzing the sample, such that the same laboratory does not analyze the same audit sample more than once.

Other topics that were raised include identification of mechanisms that can help labs perform better and control of costs to produce the audit samples due to the high cost of standards and validation processes. EPA does have some design criteria for audit samples – they are somewhat outdated and were inherited from ORD when OAR took on the program.

Additional states, stack testers, and labs need to be recruited to provide balance for the committee membership. Candace Sorrell has been talking to several states about the committee at her next meeting in early September.

Development of Working Draft Standards

The meeting participants began development of SSAS working draft standards by reviewing the existing TNI PT Module 3. Proposed modifications have been noted in the text dated 8/11/08.

Ongoing meetings

The group agreed to meet every two weeks, with the next meeting occurring on August 25th at 3:00 pm EDT.