

TNI Stationary Source Audit Sample Expert Committee Teleconference Minutes on
September 14, 2009

Participants:

Committee members

Maria Friedman, Chair
Richard Swartz, Vice-Chair
Ray Merrill
Jack Herbert
Gregg O'Neal
Michael Klein
Stan Tong

Associate members

Shawn Kassner
Mike Miller

Guest

Frank Jarke

Discussions:

The meeting was called to order at 2:09 PM EDT.

- 1) Double-check of spreadsheet/documents to be referenced in this teleconference

Maria confirmed the documents for today's meeting (sent to all on 9-13-2009).

- 2) Review and approval of minutes from teleconference on August 31, 2009

Jack requested more time to review minutes. Minutes will be approved via email.

- 3) Progress report from committee members re. review of SSAS Standards

Most committee members haven't had time to complete their review due to the recent holiday and time away from the office.

- 4) Address comments re. SSAS Standards in emails from Maria, Stan, Shawn, and Mike Schapira

- a) VDS Spreadsheet Comments Review re. Sections 7.1.6 and 7.1.7 (Maria augmented to committee's response to point out use of Complaints Handling procedures for situations not otherwise directly addressed in the SSAS Standards

Stan's review (previously sent via email) of Maria's additional comments to the subject sections was acceptable; no other comments from committee members. Ray motioned to accept; Stan seconded. All were in favor.

- b) Standards review

- i) Title of Participants VDS - Replace "Requirements" with "General Requirements."

Ray motioned to accept, Gregg seconded. All were in favor.

- ii) Section 5.4.3 of the Provider VDS - Change the number of days allotted the Provider to resolve a complaint, from 90 to 45 days.

Gregg motioned to accept, Richard seconded. All were in favor.

- iii) Section 4.1.3 of the Participants VDS being consistent with Sections 9 and 10.1 of the Provider VDS but inconsistent with Section 4.4.2 of the Participants VDS - Determine who submits audit sample results to Providers; resolve inconsistencies.

Gregg mentioned he agreed with Shawn's and Mike Schapira's comment that the Laboratory should submit the audit sample results directly to the Provider. Although, upon ordering, the Facility can also notify the Provider which party will be submitting the audit sample results to the Provider. Ray asked who currently reports audit sample results to the EPA database; the Regulatory Agencies do. Ray noted that all involved have to recognize their new roles in a privatized program.

Mike Miller suggested that whoever is the entity analyzing the audit sample should be the one reporting the audit sample results to the Provider.

Shawn suggested removing the last sentence in Section 4.1.3 of the Participants VDS to clarify that it is not the Facility who should be reporting the audit sample results to the Provider. Further discussions proceeded to Section 4.4.2 (same VDS) and Michael Klein noted that the Laboratory should submit the audit sample results not only to the Provider but also to the Regulatory Agency, at the same time. Regulatory Agencies would want to see the audit sample results before the Provider makes the evaluation. Additionally, the Laboratory should submit to the Regulatory Agency the stationary source test results.

Jack suggested an amendment to Section 4.4.2 to say that the Laboratory will submit, simultaneously, the audit sample results and the stationary source test results to the Stationary Source Tester, Facility, and Regulatory Agency. Gregg mentioned that there should be some type of grading system on how reporting is done and noted that this information can be added to the guidance document that the committee plans to write for the Participants. Maria requested Gregg to table this comment for the Guidance Document.

Michael Klein further suggested retaining the first sentence in Section 4.4.2, but amending the second sentence to say that the Laboratory will submit, simultaneously, the audit sample results and the stationary source test results to the Regulatory Agency, unless otherwise directed

by the Regulatory Agency. Michael Klein also added that Regulatory Agencies are not looking for final stationary source test results that have been adjusted based on field information. Hence, the term "stationary source test results" should be replaced with "stationary source test laboratory results."

Based on the additional discussions above, Richard amended his earlier motion as follows: Delete last sentence in Section 4.1.3 and amend Section 4.4.2 per Michael Klein's suggested language.

Maria requested a roll call vote on the motion to ensure a quorum was still present. Ray abstained; all others (6) voted affirmative. Motion carried.

Thereafter, Maria brought attention to Sections 9 and 10.1 of the Provider VDS. To maintain consistency with the motions approved for Sections 4.1.3 and 4.4.2, Jack motioned to delete all references of explicit reporting by/from Facilities (in Sections 9 and 10.1) to cover whichever entity may be reporting audit sample results to the Provider. Gregg seconded. Motion carried.

Maria will send out the updated SSAS Standards for everyone to review by COB on Friday, 9-18-2009, so that Standards may be submitted to Jane for posting on the week of September 21st. VDS comments spreadsheet must also be reviewed since it will also be posted on the TNI website.

Next teleconference will be on September 21st, 2:00 PM EDT.

Meeting was adjourned at 3:37 PM EDT.