

TNI Stationary Source Audit Sample Expert Committee Teleconference
June 15, 2009

Committee members present:

Mike Schapira
Maria Friedman
Richard Swartz
Ray Merrill
Jim Serne
Jack Herbert
Jane Wilson (program administrator)

Associate members present:

Shawn Kassner
Mike Miller
Yves Tondeur
Frank Jarke

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

Maria confirmed the updated comment spreadsheet for today's call. The Voting Draft Standard (VDS) documents are the same as for the previous meeting.

- 2) Reminder re. internal comments received

Maria asked that any internal comments should also include a proposal for revision to the affected section(s) of the standards. Also, if comments are discussed offline by committee members, they still need to be documented and provided to Maria via email for inclusion on the tracking spreadsheet.

- 3) Review and approval of minutes from teleconference on June 8, 2009

Ray asked for the detailed comments on the figure in the Participants document so he would know how to revise it (Maria will send to Ray). Jim Serne suggested it might work better to break it into two figures - one for pre-test and one for post-test. The group agreed this would clarify the intent of the figure.

Since a quorum of committee members was not present, the minutes and suggested edits to the standards will be approved later by email vote.

Mike S., Ray M., Richard S., Jim S., and Maria F. all accept the June 8 minutes as drafted.

- 4) Begin review of internal comments to VDS; start with Line 18 of the Participants Int tab

Line 18, Section 4.1.1

Mike, Ray, Richard, Jim, and Maria support the suggested addition.

Line 19 section 4.1.1.e)

Mike, Ray, Richard, Jim, and Maria support the suggested addition.

Line 20 section 4.1.1.g)

Same rationale as Line 19 – Mike, Ray, Richard, Jim, and Maria support the addition.

Lines 21-25 sections 4.1.3 – 4.2.5

The group discussed the proposed deletion of the term “measurements”. There will always be “results” for an audit sample, as a “measurement” is needed. Mike, Ray, Richard, and Jim support the suggestion. Maria noted that Jack had requested the reference to “measurement” for a specific reason. Maria abstains and will check back as to why Jack wanted to add it.

Line 26 section 4.4.1

What does “coordinate” mean in this section? Question from Yves. The lab doesn’t get involved on the front end of the audit sample and it can’t connect the audit sample to a particular job. It was suggested that the source tester and the facility should coordinate and they notify the lab to expect an audit sample. It was suggested to add this action in 4.3 (part of 4.3.1) – add “and audit sample” to 4.3.1. Strike 4.4.1.

Mike, Ray, Richard, Jim, and Maria support the proposed addition.

Line 27 section 4.4.2

Mike, Ray, Richard, Ray, Jack, and Maria support the proposed addition.

Line 28 section 4.4.3

Sometimes the facility and the source tester are the same entity. The source tester should always get the results. The group discussed whether to switch the order of the facility and tester in the text, and to make receipt by the facility upon request. Mike Miller suggested not wanting to get too prescriptive in the standard and to focus the key requirement. Shawn suggests having it go to the Stationary Source Tester, the audit sample provider, and if requested, the facility.

Mike, Ray, Richard, Jack, and Maria support the addition.

Line 29, section 4.4.4

Should the standard establish a time limit for feedback from the provider? In the Provider module the limit is 7 calendar days. Mike S. would like a briefer limit to address shorter hold times in case something needs to be rerun. Refer to 11.1.1 in the Provider document. The group decided to refine the timeframe when discussing the provider document.

Mike, Ray, Richard, Jack, and Maria support the decision to address this in the Provider document.

Line 30 section 6.2

TNI does not yet have an appeals process, so this comment cannot be addressed at this time. If it's a Provider issue, the PA could also hear an appeal. The group discussed why an appeal would go to TNI and not to the regulatory agency? Jack noted the regulatory agency deals with issues outside of just the accuracy of the audit sample. The PA document also deals with complaints about Providers.

The group recommended a change to have the appeal go to the PA and the regulatory agency – both should work together on a solution.

Mike, Ray, Richard, Jack, and Maria support the proposed change. Shawn also suggested changing “unwilling” to “unable” or to just delete “unwilling”. Or the sentence could be simplified to “if resolution is not obtained....”.

Jack is concerned about having a record of the Provider accepting the sample and the state has an issue with the testing that renders it unacceptable. How will the record show the state has rejected the measurements based on review of the audit results? The state has the ability to reject the result regardless of the acceptability of the audit sample. The Provider has no purview to reject the audit sample on any other basis like sampling. This is addressed in 4.2.5 in the Participants document. Jack suggested the Provider should then issue some kind of combined report that reflects both Provider and regulator findings. Maria asked Jack to document his comment and provide his suggested resolution via email.

Next meeting on will be June 22, 2:00 EDT.