

TNI Stationary Source Audit Sample Expert Committee Teleconference
September 13, 2010

Attendance:

Maria Friedman, Chair	Committee member	present
Michael Klein	Committee member	present
Ray Merrill	Committee member	absent
Gregg O'Neal	Committee member	present
Michael Schapira	Committee member	present
Jim Serne	Committee member	absent
Candace Sorrell	Committee member	absent
Richard Swartz, Vice-chair	Committee member	present
Stanley Tong	Committee member	present
Mike Hayes	Committee member	absent
Jane Wilson	Program Administrator	present
Shawn Kassner	Associate member	present
Mike Miller	Associate member	present
Ty Garber	Associate member	absent
William Daystrom	Guest	present

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

All on the call confirmed they received the documents for discussion via Maria's 9/10/10 email.

- 2) Review and approve minutes from NEMC Forum on August 12, 2010

Confirmation of the minutes will be completed via email since a quorum was not present at the time of this item.

- 3) Update from Chair

Maria noted that EPA will respond to questions on the changes to the EPA SSAP program. The new rule was published in the Federal Register today and will be effective in 30 days. Maria will be forwarding any questions from the SSAS EC to EPA with respect to the new rule.

Maria also mentioned the August meeting discussion about contacting the EPA regions to solicit their interest in the central database. At the time Candace indicated she wanted to do this, but perhaps TNI can do this now that the new rule has been published.

- 4) Review of Final Rule vs. TNI SSAS Program

Maria gave an overview of the spreadsheet on the new rule comparing it to the TNI standards and program. Rows 1-30 are administrative issues and provide a cross – reference to other sections of the rule. Specific items regarding the TNI standards and program begin in Row 31.

Row 31 – Shawn noted that there are some nuances in language used in the EPA rule (like “coordination” versus “collaboration”) that would be helpful to understand.

Row 32 – EPA uses “analyst” whereas TNI used “staff” – editorial change to TNI standards to use EPA terminology.

Row 33 – same as EPA, no change needed.

Row 34 – same as EPA, no change needed.

Row 35 – The committee discussed whether the two definitions for audit sample are consistent. Participants agreed the definitions are consistent and the terms “tester” and “laboratory” can remain in the TNI version. It was agreed to retain reference to “personnel” in this section, and the term “blind” will be added to the TNI definition.

Row 36 – The issue of gas phase pollutants is not specifically part of the TNI standards. Does it need to be included in the standard or referenced in the SSAS table, etc.? Shawn didn’t think it was an emergency situation that would qualify as a TIA. There might be a need to create an SOP on setting SSAS limits or develop another standard on this topic. It would imply the matrix needs to be defined for every analyte on the SSAS table. There is limited ability to use the EPA preferred approach without data available to support it. Another option is that it could be added as a footnote to the SSAS table. Maria asked Shawn to send some proposed language about how to approach this issue.

Row 37 – Ok to add to TNI Standard as TIA.

Row 38 – same as EPA, no change needed.

Rows 39 and 40 – Does the term “commercially available” need to be added to the TNI standard? If the audit sample is on EPA site, it’s considered commercially available. EPA will be monitoring available SSAS providers and those analytes considered to be commercially available. When 2 or more accredited providers are available for a SSAS, there could be a date of when this occurred. Plus a state might still require an audit sample even if it is not “commercially available” by EPA’s definition. This might be an FAQ rather than something to put in the standard. EPA is going to list providers and commercially available samples – either as lists or links. If a sample is not available 60 days before a compliance test, it doesn’t matter if the sample then becomes available. The provider accreditor should also make this information available, as will TNI.

Maria will ask EPA how they intend to handle this (via lists or links), but this issue is outside of the TNI program. Stan suggested TNI comment as to what TNI thinks would be most useful, such as a matrix of the available audit samples and the providers that can supply them. It was also suggested to get A2LA involved.

Row 41 – TNI will make sure the excluded methods are not in SSAS table. Reference to method 18 can be editorially removed from Section 8.2e in V1M1 since it is shown only as an example in this section.

Rows 42 and 43 – This will be added to the TNI FAQs and possibly include a reference to ask Regulatory Agencies for questions. Also note that states might foresee the need to test multiple SSASs for a single facility, if there are different concentrations for

different sources. A facility may argue that they don't need to do this. May want to characterize that one audit sample would be required as a minimum.

Row 44 – Estimated concentrations are not included directly in standard, but in the FAQ flow chart. Section 4.1.1 requires test plan submittal, but that is not in the Final Rule. Maybe the wording of the TNI standard should be more flexible. Maria will propose some alternate language for consideration. This may require a TIA.

Orders for SSAS will have to be in the same units as specified on the SSAS table.

Row 45 – The TNI standard does not need to be explicit about contact information as in the EPA rule.

Row 46 – The “Laboratory” is considered to be a representative of the facility, and is reporting to all participants the same time. TNI language is slightly different, but does not require a change.

Row 47 – same as EPA, no change needed.

Row 48 – This EPA requirement is for the provider. The TNI standard does not specifically require SOPs, but this should be covered by the provider's accreditation by the Provider Accreditor or ISO, etc.

Row 49 – same as EPA, no change needed.

Row 50 – same as EPA, no change needed.

Row 51 – EPA does not define “well qualified” for testers or labs. TNI can only provide acceptance limits based on historical data reported and accepted by the EPA; Maria will clarify with EPA. In a couple years, it would make sense for TNI to update the table based on new data from the TNI program. It would not be useful to enable the use of new data.

Maria will ask EPA about the interpretation of “coordination” versus “collaboration”.

Row 52 – same as EPA, no change needed.

Row 53 and 54 – same as EPA, no change needed.

Row 55 – same as EPA, no change needed.

Row 56 – same as EPA, no change needed.

Row 57 – same as EPA, no change needed.

Row 58 – The date of the compliance test is not listed in the standard, but it a required field in the central database. This element needs to be added to the TNI standard.

Row 59 – Does the TNI standard ensure that a laboratory is not receiving the same audit sample twice? This needs to be added to the TNI standard. Does it mean tracking the assignment of audit samples within a chain of labs like Test America? This requirement

will be added so that participants can see true value at the conclusion of the audit sample testing.

Row 60 – Evaluation of acceptance limits every 2 years is not covered in the TNI standard. Final rule suggests this is to be done by Providers. Maria will confirm with Candace who is responsible for this action. The determination of the acceptance criteria needs to be done by the consensus body. Table controllers should be able to access data from the database so providers don't need to report this data.

Row 61 – The committee discussed the terms "acceptable" and "not acceptable." Mike Miller suggested not to change the terms to "passed" or "failed" since he thinks they may be confused with the final regulatory judgment on the compliance test being passed or failed. Gregg explained that he does not think the final rule meant that and this is just simple usage or semantics. This discussion will continue from Row 61 in the next call on Mon, 9-20-2010, 2:00 PM EDT.

Action Items:

- Maria will update the spreadsheet and propose new language to the sections in the standard where needed, as discussed.
- Shawn will submit the SSAS Table subcommittee's proposed language as discussed in row 36.
- The 8-12-2010 minutes will be reviewed and requested to be accepted via e-mail.