

TNI Stationary Source Audit Sample Expert Committee Teleconference for  
March 21, 2011

Attendance:

Maria Friedman, Chair	Committee member	present
Michael Klein	Committee member	present
Gregg O'Neal	Committee member	present
Michael Schapira	Committee member	present
Jim Serne	Committee member	absent
Richard Swartz, Vice-chair	Committee member	present
Stanley Tong	Committee member	absent
Mike Hayes	Committee member	absent
Ken Jackson	Program Administrator	present
Shawn Kassner	Associate member	absent
Jeff Lowry	Associate member	present
Mike Miller	Associate member	absent
Ty Garber	Associate member	absent
William Mills	Associate member	absent
William Daystrom	Guest	present

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

Maria asked the committee to confirm receipt of the documents e-mailed March 18, 2011 and the amended minutes e-mailed by Jane on March 21, 2011. All confirmed receipt.

- 2) Review and approve minutes from teleconference on February 28, 2011

Jane had issued two sets of minutes from February 28, the second one having a small change in the 5<sup>th</sup> paragraph of Row 5. Maria asked for any comments on these minutes. Richard moved to accept with a second from Michael Klein. All were in favor of the motion. However, since there was not a quorum present, Maria would send the amended minutes out to the rest of the committee for them to vote by e-mail.

- 3) Discuss EPA's additional comment (TIA on Section 4.1.3 V1M2)

EPA had suggested amendment to Section 4.1.3 V1M2, which Maria re-organized as follows to meet the style and use of language in the current TNI SSAS Standard:

*4.1.3 Review historical audit sample data at least biennially to revise existing acceptance limits and establish new limits, as needed. Acceptance limits shall be set so that there is 95 percent confidence that 90 percent of well qualified Laboratories will produce future results that are within the acceptance limit range.*

*Note: The initial acceptance limits were set based on the past EPA Stationary Source Audit Program and their limited historical data, but will be revised after the first biennial review to meet the above criteria.*

The terms ("future" and "well-qualified") under contention were discussed. There was concern that "future" may be difficult to define. After some discussion, however, it was decided that the term is unambiguous since the Final Rule allows for adjustments in

acceptance limits every two years. Then when the existing limits are not met by 90% of participating labs, the existing limits will be changed at least every two years.

EPA does not have to approve how "well qualified" is defined since they already told the committee that only the common sense meaning is intended. Therefore, the committee is free to define the term. Mike Schapira suggested a "well-qualified" laboratory could be one that is accredited by a NELAP or non-NELAP state. Some, but not all, NELAP states offer air accreditation, in addition to some non-NELAP states. The SSAS Table subcommittee could discuss how this accreditation information could be acquired/solicited from Participants. Michael Klein suggested determining which labs are "well qualified" by using statistical techniques to remove outliers (e.g., Grubbs test or EPA's suggested Mosteller-Tukey bi-weight procedure). Although there was not yet agreement on which approach to use, it was agreed that a definition of "well-qualified" will be found. Thus, when the committee submits future SSAS Table revisions to the EPA, it can support that the proposed limits are from well-qualified laboratories.

It was proposed by Michael Klein and seconded by Richard to accept EPA's proposed language (re-organized) for Section 4.1.3 V1M2. All 5 members present approved the motion, and it was agreed to send it out to the remaining committee members for e-mail vote.

- 4) Resume discussion re. Audit Sample template form for estimating concentration range

The members present agreed to rename this the "Audit Sample Calculation Tool."

Maria pointed out the following comments/questions (also listed in the e-mail on March 18<sup>th</sup> re. this teleconference announcement) from William that still needed to be addressed. When done, the committee can vote to accept the calculation tool and so William can create the calculations for the other SSAS methods:

- a) Calculation tool updated - William had updated the EPA Method 29 spreadsheet based on notes from Richard. He added cells for data entry of the emission limits for all metals, and adjusted the calculated value formulas so that they also use the emission limit for each metal. Finally, he formatted that worksheet to make it apparent which cells are needed to be used for data entry.

Richard took the floor, on behalf of the Regulators, to address the rest of William's questions/comments.

- b) For Sample Rate, keep 'm3/hr' only input style or the 'ft3/hr or m3/hr' dual input style? - Michael Klein suggested retaining the sample rate units of m3/hr, and then putting the actual units used (e.g., ft3/hr) in parentheses as a note.

- c) For Emission Limit, Stan proposed revised instructions in parentheses that direct user to go to next section; need to clarify which is this section – The Emission Limits are in lb/hr, and there was a question how to alternatively use concentration units such as ppmv or mg/dscm, since this cannot just be typed into the "calculated values" section which is fixed. It was suggested an extra row can be typed between the two sections to request the concentration units used. Another approach would be to have two versions

of the spreadsheet, with one starting from mass and the other from concentration. At this point, Maria pointed out William's next question regarding adding "Estimated Stack Concentration" as an optional alternative entry instead of Emission Limit. Michael Klein suggested using the same format for entering Estimated Stack Concentration as how the Sample Rate is entered in the current Method 26 worksheet, i.e., asking user to enter one or the other. It was decided that William will insert another row for Estimated Stack Concentration, and then the spreadsheet will automatically use either the Emission Limit or the Estimated Stack Concentration, depending on which was entered, for the calculated values. Maria asked if the equations would be different. The units for Estimated Stack Concentration may differ among methods. Richard will work out with the regulators what units will be used for each method, and the equations needed to convert those units, and will report back to the committee by the beginning of April.

d) Add separate row for "Estimated Stack Concentration," in case user prefers to enter this in lieu of Emission Limit – Already covered in the discussion of c) above.

e) Molecular weights retain or remove? - It was agreed that molecular weights in the Method 29 worksheet are not required, since they are not used in the calculations, but they should remain in case they are needed in the future.

Finally, it was pointed out that the default volume on line 17 of the Method 29 worksheet should be 150 ml and not 100 ml as listed.

#### Next Steps

The next call will be scheduled for April 4 at 2:30 pm EDT, when the committee will plan to vote on the spreadsheets for Methods 26 and 29. The SSAS Table will also be discussed.

The meeting adjourned at 3:10 pm EDT.