TNI Stationary Source Audit Sample (SSAS) Expert Committee Teleconference Meeting
November 18, 2013, 1415 hrs. EST

Attendance:

Maria Friedman – Chair TestAmerica (Laboratory)	Committee member	**Present**
Mike Hayes Linde (Provider)	Committee member	**Present**
Michael Klein New Jersey DEP (State Government)	Committee member	**Present**
Theresa Lowe CCI Environmental (Stationary Source Tester)	Committee member	Absent
Paul Meeter Weston Solutions (Stationary Source Tester)	Committee member	**Present**
Gregg O'Neal, North Carolina DAQ (State Government)	Committee member	Absent
Michael Schapira Enthalpy (Laboratory)	Committee member	Absent
Jim Serne TRC Solutions (Stationary Source Tester)	Committee member	Absent
Stanley Tong EPA Region 9 (Federal Government)	Committee member	**Present**
Tom Widera ERA (Provider)	Committee member	**Present**
Bob O'Brien Sigma-Aldrich (Accredited Provider)	Committee member	Absent
Mike Miller (member at large)	Associate member	Absent
William Daystrom TNI (Webmaster)	Guest	**Present**
Charles Simon, VOC Reporting, Inc. (Laboratory)	Guest	**Present**
Katie Strickland Element One (Laboratory)	Guest	**Present**

The meeting was called to order at 1417 hours EST by the chair, Maria Friedman.

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

All present confirmed receipt of the documents (TNI SSASEC Teleconference Agenda for 11-18-2013.doc; TNI_SSASEC_Mtg_10-21-2013_draft.doc; TIA_Charles_Simon.pdf, TIA_10-18-2013.pdf, TNI SSAS WDS V1M2-Rev0.2 (Provider Accreditor).doc).

[2] Review and approve minutes from teleconference on October 21, 2013.

The minutes were reviewed. Michael Klein had e-mailed minor corrections prior to the meeting. Also, Stan pointed out that the minutes included an incorrect statement regarding Method 8 made during the October 21 meeting: the minutes stated or implied that Method 8 allowed the use of Ion Chromatography (IC) in the presence of strong interference. Stan wanted to clarify for the record that use of an alternative technology such as IC for Method 8 requires approval by the EPA Administrator, as stated in Method 8 section 4.1.

Stan moved to accept the minutes with the corrections proposed by Michael Klein. Mike Hayes seconded the motion. Paul Meeter abstained. All remaining committee members voted affirmative. Maria will seek votes from absent members by e-mail.

[3] SSAS Central Database update

William Daystrom reported the following updated statistics for the database to date:

- 227 audit samples uploaded (a number was not reported on the last call)
- 772 reported audit sample results, up from 517
- 103 Regulator IDs issued, up from 87
- 126 Stationary Source Tester IDs issued, up from 111
- 67 Laboratory IDs issued, up from 56

William reported that the pass/fail rates had not appreciably changed since his report on the October 21, 2013 call. Paul asked for clarification that Hg on Filter Paper by Method 29 was not required by the EPA. Maria confirmed and said the SSAS Table had been updated, but it also benefited the program to have the data for Hg. Katie asked whether the Stationary Source Tester can be forced to re-test if they fail an audit sample that was not required. Maria said no. Michael Klein suggested that the Provider should notify participants that Hg on filters is not required, and said he has been notifying people when asked. Tom Widera confirmed that ERA was already so notifying their customers when orders are received. Most customers do not go ahead with the order, but some do. Maria will ask Bob O'Brien whether Sigma-Aldrich RTC is likewise notifying customers.

[4] Chair Update

Maria pointed out that the proposed Tentative Interim Amendment (TIA) deviates from the EPA Final Rule, however, the committee will discuss it so we can reach a consensus on a proposal to make to Candace at EPA, since the TIA will help the SSAS Program.

[5] Discuss TIA for multiple audits to the same Lab.

The committee discussed the TIAs proposed on the October 21 call and subsequently updated by Charles Simon.

TIA #1: V1M1, Section 3.6:
Manufacturing Lot: A group of audit samples made at one particular time in one particular place for one particular method at one particular concentration.

Maria polled the committee members and all agreed with TIA #1.

TIA #2: V1M1, Section 8.3:
The Provider shall not:
f) Send ~~the same~~ an audit sample from the same manufacturing lot ~~twice~~ to the same Facility or Laboratory more than 8 times in a twelve month period. Providers shall have ≥3 baseline manufacturing lots of audit samples at each concentration range that vary from each other by ≥10% in concentration. Other lots with less variance may be used in addition to the three baseline lots. A concentration range is defined as the lowest and highest concentration values for the analytes listed in the current SSAS Table, and concentrations between the extrema at intervals of ½ orders of magnitude (5X) or less.

Maria had two comments: 1) She wanted to reinstate the restriction that the same audit sample not be sent "consecutively, or more than once in a calendar month," which was present in an earlier draft of the TIA. 2) She said the definition of a concentration range should not be in Section 8.3. She pointed out V1M1 Section 6.4 would be more appropriate.

Stan agreed with Maria's first comment.

Tom expressed concern with the language defining the concentration range as "the lowest and highest concentration values for the analytes listed…" ERA manufactures impinger solutions as concentrates requiring a pre-dilution before analysis, which would make it physically impossible to make a solution (e.g. for Method 29) at the high end of the concentration range. He did not recall getting a request for all compounds to be at the high end, and the trend has been toward lower concentrations. He suggested removing the concentration range definition stated in TIA #2.

Maria asked for clarification from Tom about how the Provider created a "manufacturing lot." Tom said that in some cases, they would start with a stock concentration, and then make a dilution to a lesser concentration. The lesser concentration would be a "manufacturing lot."

There was discussion about whether the phrase "Providers shall have ≥ 3 baseline manufacturing lots of audit samples at each concentration range that vary from each other by ≥ 10% in concentration" meant that the Providers would manufacture at least 3 lots of audit samples at each concentration (e.g. three @ 5ppb, three @ 7ppb, three @ 10ppb) or whether it meant that Providers would manufacture at least 3 lots per concentration range, with each lot varying by ≥10%. Tom suggested removing the word "range" from the statement, to make it clear that the manufacturing lots are made at different concentrations that vary by ≥10% in concentration." Michael Klein said that it did not make much difference to him, since when he reviewed audit sample orders, he would request the concentration from the Provider that he wanted for the site being tested. Katie added that the requirement to have at least 3 manufacturing lots at different concentrations meant that the true concentration would still be unknown to the Tester or Laboratory since they would not know how many lots had been made.

Maria brought the discussion to a close and said she would prepare and send by e-mail to the voting members a new TIA proposal reflecting the consensus from today's meeting:

TIA #1 would remain as-is.

TIA #2 would be changed as follows:

1) Add the requirement that an audit sample from the same manufacturing lot not be sent to the same Facility or Laboratory "consecutively, or more than once in a calendar month."

2) Move the requirement to have 3 or more manufacturing lots to Section 6.4, and change the language to clarify that the lots would be at different "concentrations" instead of "concentration ranges."

3) Remove the definition of "concentration range."

A vote will be held by e-mail. If approved, the TIAs will be submitted to the Consensus Standards Development Executive Committee (CSDEC) and to Candace at EPA.

Maria said she had not received any other comments regarding changes to V1M1, and therefore on the next call the committee would look at V1M2.

The next TNI-SSAS committee teleconference will be on December 9, 2013 at 1400 EST. The meeting was adjourned by the Chair at 1530 hours EST.

TNI Stationary Source Audit Sample Expert Committee Teleconference Agenda for November 18, 2013:

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

2) Review and approve minutes from teleconference on October 21, 2013

3) SSAS Central Database Update

4) Discuss Draft Tentative Interim Amendments

5) Discuss TNI SSAS Standard, Volume 1, Module 2