TNI Stationary Source Audit Sample (SSAS) Expert Committee Teleconference Meeting

December 16, 2013, 1400 hrs. EST C.G. Simon

Attendance:

Maria Friedman – Chair TestAmerica (Laboratory)	Committee member	**Present**
Charles Simon – Vice Chair VOC Reporting, Inc. (Laboratory)	Committee member	**Present**
Mike Hayes Linde (Provider)	Committee member	Absent
Michael Klein New Jersey DEP (State Government)	Committee member	**Present**
Theresa Lowe CCI Environmental (Stationary Source Tester)	Committee member	**Present**
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	**Present**
Jim Serne TRC Solutions (Stationary Source Tester)	Committee member	**Present**
Stanley Tong EPA Region 9 (Federal Government)	Committee member	Absent
Tom Widera ERA (Provider)	Committee member	**Present**
Bob O'Brien Sigma-Aldrich (Accredited Provider)	Committee member	**Present**
Mike Miller (member at large)	Associate member	Absent
William Daystrom TNI (Webmaster)	Guest	**Present**
Katie Strickland Element One (Laboratory)	Guest	**Present**
Kelly Feist ACLASS (Provider Accreditor)	Guest	**Present**
Rob Knake A2LA (Provider Accreditor)	Guest	**Present**

The meeting was called to order at 1404 hours EST by the chair, Maria Friedman. There was a quorum present.

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

All present except Paul Meeter confirmed receipt of the documents (SSAS_TIA_11-18-2013.pdf, TNI SSASEC Teleconference Agenda for 12-16-2013.doc, TNI_SSASEC_Mtg_11-18-2013_draft.doc TNI SSAS WDS V1M2-Rev0.2 (Provider Accreditor).doc). Maria re-sent all documents to Paul and he acknowledged receipt.

[2] Review and approve minutes from teleconference on November 18, 2013.

The minutes were reviewed. After one name correction on page 3 a motion was made by Charles Simon to accept the minutes. Michael Kline seconded the motion. There were 5 Yea votes and 4 Abstentions. Maria will canvas the other committee members by email for their votes on the 11-18-13 minutes.

Chair update

Charles Simon is now a voting member of the Committee and Maria has appointed him Vice Chair.

In January Maria will start asking for volunteers to take the minutes, or will assign a member, so everyone can participate in this responsibility.

[3] SSAS Central Database update

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

- 935 reported audit sample results, up from 772
- 106 Regulator IDs issued, up from 103,
- 132 Stationary Source Tester IDs issued, up from 126,
- 69 Laboratory IDs issued, up from 67.

Charles asked for an update on the Method 8 audit results. William reported there are 29 M-8 ampule audit results with 88% pass rate for SO2 and 57% for SO3, and 24 filter audits with 100% pass rate for SO2 and 87% pass for SO3.

Charles asked if there was any grouping of the SO3 failures. William replied that he did not have those data but he recalled they were scattered, but there are not enough data to detect a trend.

Maria reported that TNI has approved the recent V1M1 Section 3.6 TIA. The TIA still needs to be approved by EPA before it can be posted on the website. Maria sent it to Candace at EPA/OAQPS for review but has not received a response yet. The final wording of this TIA follows.

TIA #1: V1M1, Section 3.6:

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 will send the final version of the Section 8.3 TIA wording which was discussed by email by voting members. The final wording of this TIA follows.

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 consecutively, or more than once in a calendar month, or more than eight (8) times in a twelve month period.

The requirement to have 3 or more audits at each concentration range that vary by >10% from each other was moved to Section 6.4. The wording of this TIA follows.

TIA #3: V1M1, Section 6.4:
6.4.1 Providers shall supply audit samples that reflect the concentration ranges in the SSAS Table. If requested by the Regulatory Agency and/or the Facility, ranges that are not listed in the SSAS Table may be included in an audit sample if the purpose and technical justification are documented, and if, where appropriate, the Regulatory Agency and/or Facility are notified in advance.

a) Providers shall have three (3) or more baseline manufacturing lots of audit samples at different concentrations that vary from each other by 10% or more in concentration. Other lots with less variance may be used in addition to the three baseline lots.

[4] Discuss TNI SSAS Standard, Volume 1, Module 2

Since there were no more suggestions for changes to V1M1, Maria called for suggestions for changes to V1M2. Rob Knake said A2LA had no suggestions at this time and that the program seemed to be going well. Kelly Feist said ACLASS had no suggestions at this time either.

Maria will post a working draft version of the standard for public comment. After each public comment is addressed we will make a voting draft of the standard.

Mike Schapira mentioned that Providers did not like it when Regulators told them what concentrations to make audit samples. Maria responded that this was not an issue that could be addressed since the rules require Regulators to have input into the audit selection process.

Bob O'Brien said this was an issue at Sigma-Aldrich earlier, but it is resolved now. Tom Widera said ERA supplies concentrations near the Regulator-requested values.

Discussion followed concerning Regulators' requests for audit concentrations outside of the Table range. This has caused problems with the Laboratories when the audit concentration was lower than the minimum value in the Table. Mike Schapira said he's had 4 or 5 calls about this but he could not respond. Should Labs call the Regulators? Regulators should not give the Lab any information about the audit.

Tom Widera pointed out that the rules allow for Regulators to request concentrations outside those listed in the Table. Michael Kline said there are no pass/fail criteria for audit samples with concentrations outside the Table range. Mike Schapira said the system needs to let Labs know the audit concentration is outside the Table range. Maria agreed and pointed out that V1M1 Section 6.4.1 does allow for Regulators to request concentrations outside the Table range, but not for different analytes.

Michael Kline said the facility must be notified if the audit is outside the Table concentration range, but there are no pass/fail criteria. We need to have new "historic data" to expand the ranges in the future. The current limits were meant for the startup of the Program.

There was further discussion and general agreement that a Provider should notify the audit recipients when a sample is outside of the Table concentration range. There was also agreement that we need to collect data for concentrations outside the current ranges, and the results from audit samples in this regime will build on those data even though they can't be evaluated for pass or fail based on the acceptance criteria for concentrations currently within the Table ranges.

There was some discussion of asking the Providers to generate these data in their respective facilities, but those facilities must generate the audit samples with much greater accuracy and are not equipped to perform the Reference Test Methods, so this approach will not work.

Maria pointed out that our SOP has a method for extending the concentration ranges of analytes. Twenty data points are required to determine acceptance criteria. Since the Table will be updated every two years, we need to review all data points outside the listed ranges in search of 20 applicable data points from the reported results.

There was further discussion of ways to get results for lower concentration ranges, and agreement that those audits could not be given a pass or fail rating. The low limits in the Table were set by historic data, so the acceptance criteria for those limits cannot be applied to concentrations outside those limits. There was some discussion of having advisory acceptance criteria, or using the acceptance criteria for the lowest Table concentration to act as a guide to performance while accumulating the new historic data.

Maria summarized by saying we need to modify V1M1 Section 6.4.1 to include a requirement that appropriate statements be included in the audit instructions when the audit concentration is outside the Table range. There are currently no acceptance criteria for the audit.

Bob and Tom both said they were OK with this. Maria will write this TIA and send to members for email discussion.

There were no amendments to V1M2.

The next TNI-SSAS committee teleconference will be on January 7, 2014 at 1400 EST. The meeting was adjourned by the Chair at 1530 hours EST.

TNI Stationary Source Audit Sample Expert Committee Teleconference Agenda for December 16, 2013:

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

2) Review and approve minutes from teleconference on November 18, 2013

3) SSAS Central Database Update

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