

TNI Stationary Source Audit Sample Expert Committee Teleconference  
February 19, 2013, 1405 PM, EST

**Attendance:**

Maria Friedman – Chair TestAmerica (Laboratory)	Committee member	<b>Present</b>
Mike Hayes Linde (Provider)	Committee member	Absent
Michael Klein New Jersey DEP (State government)	Committee member	<b>Present</b>
Theresa Lowe CCI Environmental	Committee member	Absent
Paul Meeter Weston Solutions (Stationary Source Tester)	Committee member	<b>Present</b>
Gregg O’Neal, North Carolina DAQ (State government)	Committee member	<b>Present</b>
Michael Schapira Enthalpy (Laboratory)	Committee member	<b>Present</b>
Jim Serne TRC Solutions (Stationary Source Tester)	Committee member	Absent
Stanley Tong EPA Region 9 (Federal government)	Committee member	<b>Present</b>
Ty Garber Phenova (Provider)	Associate member	Absent
Shawn Kassner Phenova (Provider)	Associate member	<b>Present</b>
Mike Miller (Member at large)	Associate member	Absent
Geneva Powman (ACLASS)	Guest	<b>Present</b>
William Daystrom TNI (Webmaster)	Guest	<b>Present</b>
Charles Simon (VOC Reporting)	Guest	<b>Present</b>

(1) Call to Order

The meeting was called to order at 1405 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.

[2] Review and approve minutes from teleconference on January 15, 2012.

Maria indicated two corrections to the minutes: change “Field Procedures Item 5” to “Lab Procedures Item 1”, and remove Wayne Stollings and Rob Knake’s names from the

attendance list since they were absent. (Only include the names of guests who are present.) The minutes were passed as amended and Charles sent an amended copy by email to all members.

## (2) Provider Update

Geneva reported that that RTC-Sigma Aldrich received certification to be an SSAS provider yesterday (2/18/2013). Geneva will send Maria a copy of the certification with the scope of services. Greg asked if there was product available. Geneva did not know. Maria will notify Candace at OAQPS as soon as she receives the information from Geneva.

Shawn Kassner, now with Phenova, says his new employer has no plans at this time to pursue being an SSAS provider. (Shawn will remain on the committee.)

## (3) Annual SSAS Committee Officer Elections

Maria called for elections of the positions of chair and vice-chair. Gregg nominated Maria for a second term as Chair. A unanimous vote by all members present followed. Maria will remain as Chair for a second term. She reminded members that TNI rules will not permit her to accept another chairmanship on the SSAS committee next term.

There were no nominations for vice-chair, so Maria said she would canvas all members by e-mail and then appoint someone as vice-chair.

## (4) Review M25 Subcommittee recommendations: working document is dated 1/10/13.

Stan commented that EPA's Office of Air Quality Planning and Standards (OAQPS) Methods define the results and the 200°C Method-25 sample recovery temperature may be how the method defines a VOC.

Charles responded that he believes this was never the intention of OAQPS when Method-25 was updated in 1989 to include the 200°C recovery temperature and a heated probe with a 250°F glass fiber filter (GFF). Charles offered the following comments on the topic before proceeding to discussion on the remaining sub-committee recommended improvements.

The cutoff for VOC versus PM is intended to be the 250°F GFF. Any non-exempt organic compounds that pass through the filter are VOC. There was nothing in the development docket to indicate the 200°C recovery temperature was meant to define VOC. When queried in 1995 about this issue, OAQPS (Gary McAllister) responded verbally that they simply felt that 200°C (392°F) was hot enough to volatilize any organic material that passed through the 250°F. Charles stated that this response was consistent with the research docket. However, the researchers had not considered thermally unstable (reactive) organic compounds that would polymerize to heavier compounds upon warming and remain in the M-25 trap. This phenomenon is not uncommon and frequently leads to poor sample recovery and the inability of the extraction system to reach the 10 ppmC endpoint for the Method.

At the time, OAQPS advised that if a higher temperature was needed to complete the M25 recovery step to the endpoint, be sure that (1) the traps were cleaned at a higher temperature than they were recovered, and (2) the actual extraction temperature used for each sample be included in the report.

This process was followed by both Method 25 laboratories serving the nation until 2012 when new staff at OAQPS (Ray Merrill) declared that higher recovery temperatures are considered a major modification to the Method and are not approved. He further wrote that any M25 test performed with extraction temperatures >200°F will be considered invalid. Dr. Merrill did not change his position after being relayed substantial evidence to the contrary. So, here we are.

Stan commented that the idea of presenting an alternative method makes sense, but he's still concerned about the temperature recovery issue. Charles said that is why we will present the recommended improvements through Office of Enforcement and Compliance Assurance-Headquarters (OECA-HQ) as "Alternate Method 25Z". The improvements OECA accepts will then be presented to OAQPS in the same format.

Lab Procedures Item 2 concerning eliminating CO<sub>2</sub> interference from M25 samples was briefly discussed as recently modified and presented in the file "M25 improvements doc dated 1-10-2013.feb" (attached). A vote was taken and the recommendation passed as modified unanimously.

Lab Procedures Item 3 concerning using the low-range calibrated CO<sub>2</sub> NDIR to determine the backflush and recovery endpoints was briefly discussed. Charles assured the committee that "Alternate Method 25Z" included procedures for calibrating the low range of the NDIR with CO<sub>2</sub> calibration gases already specified in M25. A vote was taken and the recommendation passed unanimously.

Lab Procedures Item 4 concerning adding the explicit requirement that the sample tank temperature be recorded in the laboratory along with its pressure as currently required. This was an apparent oversight in M25. A vote was taken and the recommendation passed unanimously.

This concludes discussion of all improvement topics except the M25 blank procedures, which were tabled earlier. These will be discussed in the next call. Maria will contact all parties by email with the time and details of the next call.

The meeting was adjourned by the Chair at 1529 hours EST.