

TNI Stationary Source Audit Sample (SSAS) Expert Committee Teleconference Meeting
March 10, 2014, 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	Present
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	Present
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	Present
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
Kelly Feist A Class (Provider Accreditor)	Guest	Present
William Daystrom TNI (Webmaster)	Guest	Present
Katie Strickland Element One (Laboratory)	Guest	Present
DeAnna Oser Georgia DNR (State Government)	Guest	Present

The meeting was called to order at 1405 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 confirmed receipt of the documents [TNI SSASEC Teleconference Agenda for 3-10-2014.doc; TNI SSAS WDS V1M3-Rev0.2 (Participants).doc; SSAS Stats 3-9-2014.pdf].

[2] Review and approve minutes from teleconference on December 16, 2013.

The minutes were reviewed and there were no corrections. Theresa Lowe moved to accept the minutes and Mike Schapira seconded the motion. There were 10 Yea votes and 2 Abstentions. The minutes passed.

[3] Chair update

Maria reminded all that TNI rules require voting members to be members of TNI. When she looked up membership some of our voting members did not show up as individual members of TNI. This may be because their affiliated employer has a group TNI membership that includes them, or their TNI individual memberships may have lapsed. Maria asked Mike Hayes, Theresa Lowe, Gregg O'Neal, Stanley Tong and Tom Widera to please check on this. Maria also reminded everyone that to remain a voting member you must not be absent for 3 consecutive meetings.

Katie Strickland has been approved by the committee to become a voting member and we're waiting for TNI Board approval. Theresa Lowe has submitted a request to remain a voting member for a second three-year term. Maria asked Paul Meeter to submit a request for a second three-year term as a voting member and reminded everyone of this requirement.

Maria asked Tom Widera and Bob O'Brien if ERA and Sigma-Aldrich use TNI analytical method codes. They will check to see if the TNI codes are included in their reports. Maria would like to see an example report. Bob and Tom will provide her with example reports. Maria responded that the TNI code listing should be in our Standard.

Theresa Lowe mentioned that there were some problems getting audit orders to Sigma. Bob responded that he'll straighten this out.

[4] SSAS Central Database Update

William Daystrom presented a summary table in PDF format of the database as of 3/9/2014 which is appended to these minutes. The Table update showed that there are 110 Testers IDs, 56 Laboratory IDs, and 92 Regulator IDs in 41 states.

There have been 1290 audit results reported to date with >90% pass rates for all analytes except SO3 mist (86% pass) and HF (50% pass). A question was asked why there are still filter results listed for Methods that have no filter audits. William responded that was the way the data were reported by the Providers and that it is time to add a "media" filter to the incoming data acceptability criteria. This will take a few weeks to implement. Tom responded that this was the result of a training error at ERA. Audit results listed in terms of mg/dscf were entered as filter results by technicians. They are currently trying to fix this problem. All filter results for Methods 6, 8, 26 and 26A are ampule results.

How can this be fixed in the current data base? Charles Simon asked if we could just change the entries to the correct media, or do we need to go through a formal process? Bob responded that he's

not sure. Jim Serne asked if “cannot evaluate” results are currently listed as either pass or fail. William responded yes, that is currently the case, they are listed as pass or fail. Maria said that we have already addressed this problem in V1M1 and made the appropriate changes to the Standard and they will go into effect soon. So, how can we fix our current result listings? Tom said that we’ll have to wait until the V1M1 changes go into effect, and then we can correct listings in the database.

DeAnna Oser said that States do not understand this issue and routinely request Audit concentrations outside the Table ranges. Maria said that William needs to create a “cannot evaluate” category for the database. Tom said that for the PT program, they cannot make samples outside the accepted ranges. A suggestion was made that we add a filter to the database program that would automatically place a result for an analyte outside the Table range in the “cannot evaluate” category. The listing will include the actual and reported analyte concentrations.

There was more discussion on the relevance of audit samples outside the Table ranges, which were set by EPA based on historic data. It takes research to extend these ranges and it seems like Industry is now being asked to fund this research. DeAnna said the Candace Sorrell of EPA/OAQPS should send State Regulators a letter explaining the issue of using audit sample outside the Table ranges, and the fact that the results can’t be used legally.

Charles said that the only decision for Regulators in an air emission compliance test is whether or not the Source is in compliance with their air permit. If audit samples with concentrations lower than the minimum in the Table range are ordered and used since they are near the concentration of the actual samples, then the Regulators are still able to decide if the Source is in compliance or not regardless of the Audit sample results, but those results will add or subtract credibility from the emission results. So, even though they can’t be used to “fail” the compliance test, the audit results can be used as justification to require an additional emission test, or any other action under the Regulator’s authority. Charles agreed with DeAnna that there is a need to notify Regulators of this aspect of the SSAS program.

Maria responded that we should encourage the use of Audit samples outside the Table range since this is the only way to expand the Table. There are no research funds to do this, and we need to expand the ranges to lower concentrations. We also need to expedite the updates to V1M1. It can be posted soon as a working draft. She will send it out for final comments.

William will find results for audit samples outside the Table ranges in the database and move them to a “cannot evaluate” category. (We need 20 data points to expand an analyte concentration range.)

Maria said there is one week left for comment on V1M1 and then we can post it as a working draft standard. After final public comment, the updated Standard can go into effect. Paul Meeter asked if the database can be modified within the 2-month time frame for V1M1 update final approvals. William responded yes, just waiting for the Standard changes.

Katie reminded the group that reporting field sample results to Regulators is still an issue for Testers.

The next TNI-SSAS committee teleconference will be on March 24, 2014 at 1400 EST. The meeting was adjourned by the Chair at 1507 hours EST.

TNI Stationary Source Audit Sample Expert Committee Teleconference Agenda for March 10, 2014:

- 1) Double-check receipt of documents to be referenced in this teleconference
- 2) Review and approve minutes from teleconference on February 24, 2014
- 3) Chair Update
- 4) SSAS Central Database Update
- 5) Discuss TNI SSAS Standard, Volume 1, Module 3