

TNI Stationary Source Audit Sample (SSAS) Expert Committee Teleconference Meeting  
March 24, 2014, 1400 hrs. EDT C.G. Simon

**Attendance:**

Maria Friedman – Chair TestAmerica (Laboratory)	Committee member	<b>Present</b>
Charles Simon – Vice Chair VOC Reporting, Inc. (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 (Stationary Source Tester)	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	<b>Present</b>
Katie Strickland Element One (Laboratory)	Committee member	<b>Present</b>
Stanley Tong EPA Region 9 (Federal Government)	Committee member	Absent
Tom Widera ERA (Provider)	Committee member	Absent
Bob O'Brien Sigma-Aldrich (Accredited Provider)	Committee member	Absent
Mike Miller (member at large)	Associate member	Absent
David Elam TRC (Stationary Source Tester)	Guest	<b>Present</b>
William Daystrom TNI (Webmaster)	Guest	<b>Present</b>
Maggie Congro Catalyst Air Management (PCD vendor)	Guest	<b>Present</b>
Clayton Johnson Catalyst Maxxim Analytics (Laboratory)	Guest	<b>Present</b>
DeAnna Oser Georgia DNR (State Government)	Guest	<b>Present</b>

The meeting was called to order at 1405 hours EDT by the chair, Maria Friedman. There was a majority 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 3-24-2014.doc; TNI SSAS WDS V1M1-Rev0.3 (Provider)\_r3.pdf]. Maria will email the docs as we proceed to our two new guests, Clayton Johnson and Maggie Congro.

[2] Review and approve minutes from teleconference on March 10, 2014.

The minutes were reviewed and there were no corrections. Gregg O'Neal moved to accept the minutes and Mike Schapira seconded the motion. There were 7 Yea votes and 1 Abstention. The minutes passed.

A side discussion was started when Jim Serne asked if Maria had received examples of Provider reports as he has several that he could forward. Maria said that she had gotten one report from Bob O'Brien of Sigma-Aldrich. Jim mentioned that it was important to see the paperwork as past reporting was by email. Jim said he has examples of both ERA and Sigma reports from Mike Schapira's lab, Enthalpy, and asked if it would be OK to share them with the committee. Mike Schapira had no objection. Mike Schapira brought up another point when he said his lab had recently failed an audit HIGH and when they re-analyzed the sample it was 2X higher. This result needs to be reported to and discussed with the Provider quickly to find the problem, but there has been no response yet. This points out a need to improve the complaint process.

[3] Chair update

Maria reminded all that it was time to start rotating the duty of recording the minutes. Maria will take the minutes for the next call, and then Katie or Theresa will have a turn, followed by a randomized schedule to be announced by the Chair. If an assigned scribe is not present, a backup scribe will be appointed based on the listed order

Katie Strickland is now an approved committee voting member.

Maria reminded all that for TNI membership make sure your name is included in your organizations list of assigned members.

Maria noted that TNI is still providing EPA membership at no cost.

Jim Serne asked about the membership costs for organizations and William Daystrom responded that it varies based on the number of designated individual members.

[4] SSAS Central Database Update

William Daystrom emailed all an updated and corrected summary table in PDF format of the database as of 3/23/2014 which is appended to these minutes. Previous incorrectly reported filter results are now correctly listed as ampule samples.

We are still at 41 states participating in the program. Nine states have had no audit samples. William said he told Stanley Tong about this and Stan said he would bring it up in the next monthly EPA teleconference. EPA will do an outreach to these states. Jim said the non-participating states are: Connecticut, Hawaii, Mississippi, New Mexico, North Dakota, Oklahoma, Rhode Island, South Dakota and Vermont.

Maria asked if any of these states participated in the monthly EPA calls and DeAnna Oser responded no, she has never heard them on any calls. Maria asked if they could legally side-step the audit program and Michal Klein looked up the regulation which said, in part, that Administrators could opt out of requiring audit samples if they felt the audits were not necessary. Maria then called for an end to this discussion as it was up to EPA to address this matter and not the responsibility of the TNI SSAS committee.

William said he looked at 15 custom samples outside of the Table range, mostly lower, and provided a list of results. Bob O'Brien had said earlier that Sigma does not provide samples outside the Table range due to increased cost. So, all of the 'custom' audits outside the Table ranges came from ERA. In their Provider reports for these samples ERA used the acceptance criteria that applied to concentrations in the Table that were closest to the custom sample's concentration.

Maria is still seeking advice from EPA on audit samples outside of the Table range. Discussion followed of the merits of allowing or disallowing custom audits outside the Table ranges. Some members pointed out that allowing such samples would serve to expand the Table ranges and was even encouraged in the rules governing expansion of the Table ranges. Other members pointed out that such custom audit samples serve no legal purpose and may not even serve to expand the Table ranges since so few laboratories analyze such samples.

There was more discussion on the best way to expand the Table ranges and pay for the effort. There was agreement among the members that the Table ranges need to be expanded, particularly to lower values, as the program progresses. The PT program may be of some help, but generally the PT audit ranges mirror the SSAS Table ranges. Using internal laboratory QC samples was discussed. A round-robin effort was cited as the most likely solution, but the cost of such a program has to be considered.

Maria sent the following notes with three options for refining the SSAS regulations to all members:

Note: The attached WDS includes changes previously approved by this Committee as well as changes that we have either discussed or that have been proposed by members in previous discussions.

Most of the changes involve the question of how to address out-of-range audit samples. The WDS includes text for three options:

**Option A:** This option allows audit samples outside of the SSAS Table range, and requires that they receive "Cannot Evaluate" evaluations by Providers. This option was approved by the Committee in discussions earlier this year.

**Option B:** This option also allows audit samples outside of the SSAS Table range, but specifies that Providers evaluate the audit sample using the acceptance criteria from the SSAS Table for the concentration nearest the audit sample concentration. This is what Providers have been doing when they evaluated out-of-range audit samples in the past.

**Option C:** This option disallows audit samples outside of the SSAS Table range. By the EPA Final Rule and also by definition in the TNI SSAS Standard, an audit sample is provided to evaluate results within specified acceptance criteria. An audit sample produced outside of the SSAS Table range has no acceptance criteria; therefore, it cannot be considered an audit sample. If a Regulator or other entity wished to order an audit sample outside of the SSAS Table range, a Provider could only offer such a sample as a form of Quality Control sample, not within the bounds of the SSAS Program.

Charles Simon made a motion to drop option B from consideration. Jim Serne seconded the motion. There were 8 Yea votes and zero opposed. Option B was dropped.

There was further discussion on options A and C followed by a motion to have a roll-call vote for options C and A. The following members voted for option A: Gregg O'Neal, Mike Schapira and Charles Simon. The following members voted for option C: Paul Meeter, Jim Serne and Michael Klein (only if the last sentence was dropped). Gregg O'Neal then changed his vote to Abstain and Mike Schapira changed his vote to option C. Based on these results, Maria will email all members the two options and ask for another vote by all.

The next EPA teleconference is April 7, 2014 and this topic will be discussed. Paul pointed out that EPA may not provide guidance by April 14, 2014 and that we should proceed with our own decision.

The next TNI-SSAS committee teleconference will be on April 14, 2014 at 1400 EDT. The meeting was adjourned by the Chair at 1533 hours EDT.

TNI Stationary Source Audit Sample Expert Committee Teleconference Agenda for March 24, 2014:

- 1) Double-check receipt of documents to be referenced in this teleconference
- 2) Review and approve minutes from teleconference on March 10, 2014
- 3) Chair Update
- 4) SSAS Central Database Update
- 5) Discuss TNI SSAS Standard, Volume 1, Module 1