

TNI Stationary Source Audit Sample (SSAS) Expert Committee Teleconference on April 14, 2014
- Minutes by Maria Friedman

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
Bob O’Brien Sigma-Aldrich (Provider)	Committee member	Present
Gregg O’Neal North Carolina DAQ (State Government)	Committee member	Present
Michael Schapira Enthalpy (Laboratory)	Committee member	Absent
Jim Serne TRC Solutions (Stationary Source Tester)	Committee member	Present
Katie Strickland Element One, Inc. (Laboratory)	Committee member	Present
Stanley Tong EPA Region 9 (Federal Government)	Committee member	Present
Tom Widera ERA (Provider)	Committee member	Present
William Daystrom TNI (IT Administrator)	Guest	Present
David Elam TRC Solutions (Stationary Source Tester)	Guest	Present
Brandy Hughes Alliance Source Testing (Stationary Source Tester)	Guest	Present
Roy Owens Owens Corning (Stationary Source Tester)	Guest	Present

Maria Friedman called the meeting to order at 1405 HRS EDT. There was a quorum present.

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

All present confirmed receipt of the documents that were sent by Maria (4-11-2014), William (4-13-2014), and Charles (4-14-2014).

[2] Review and approve minutes from teleconference on 3-24-2014

Michael Klein pointed out his name was misspelled. Jim also said that in Section 4 regarding the SSAS Central Database update, he had enumerated the non-participating states, and not Gregg. Gregg moved to approve the minutes as corrected. Charles seconded. A voice vote was held and the minutes were approved.

[3] Chair Update

Maria said that the SSAS Table Subcommittee may be reactivated and tasked with researching and proposing whatever changes are needed to expand the SSAS Table concentration ranges, per the discussions that had been held in the committee and with EPA in recent weeks. Maria asked which of the members present on the call had been on the SSAS Table Subcommittee. Gregg, Mike Schapira, Jim, and Stan had been members. Maria asked if anyone volunteered to chair the subcommittee. Nobody volunteered. Jim suggested waiting to see what EPA wanted -- he is against industry paying for research samples. Charles, Tom, and Bob volunteered to be on the subcommittee. Paul asked what the time commitment would be, to which Maria replied she thought it would be long-term, but the subcommittee sets its own schedule according to tasks. Every two years (at least) we need to update the SSAS Table.

[4] SSAS Central Database Update

William presented the update on Central Database statistics e-mailed prior to the call. In response to a question, William said that the earlier-announced \$25 fee for access to the Central Database was still expected to start in May 2014, and that the fee would not apply to Regulators or Providers. Information about this would be distributed once the procedures had been finalized.

There was some discussion about the nine states that are still not participating in the SSAS Program. Stan reported some of those states were represented on the EPA QA call. Some states may not have stationary sources. EPA is checking on Hawaii. On the call, Candace said it was up to EPA enforcement to act if some states are not participating in SSAS. Maria also requested Stan to reach out to those states.

There was a question about Method 8 versus Method 13A. Gregg said if a conditional method like CTM-13A or NCASI Method 8A references a SSAS method like Method 8, then that conditional method should be audited.

Paul asked about Method 29 Hg filter audits -- should they be in the Central Database, since they are not approved by EPA? Maria said that even though EPA has not approved them, they are in the SSAS Table and therefore should be in the Central Database. She noted that Footnote 18 was added to the SSAS Table to point out that participants should check with EPA to confirm which methods are required to be audited. Maria had followed up with EPA on the question of Method 29 Hg filter audits without an answer. Tom said that since Method 29 Hg filters are in the SSAS Table, it is a "voluntary" analyte. Maria added it to her to-do list to again follow up with EPA.

[5] Establish effective date for approved SSAS Table update

The committee had previously approved by e-mail vote a revision to the SSAS Table. The committee now needed to set an effective date. Tom recommended setting the effective date to be immediate: 4-15-2014. Gregg asked about samples already ordered outside the SSAS Table range. Maria said the SSAS Table changes would apply to samples ordered as of the effective date. Tom would check after the call to see if there were any in-progress audits outside the SSAS Table range, but he did not think there were any. Bob O'Brien also said that Sigma-Aldrich RTC did not have any at present. Jim moved to make the effective date of the new SSAS Table 4-15-2014. Tom seconded. A roll call vote was held and all present voted in favor.

[6] Discuss TNI SSAS WDS, Volume 1, Module 1

The committee reviewed the following proposed changes in V1M1:

1. Maria said an ANSI logo would be added to the title page. This is a TNI requirement. There was no opposition.
2. Jim proposed adding a note to the Preface stating that the standards were developed to fulfill the requirements of EPA's restructuring of the audit sample program. There was no opposition.
3. Jim proposed adding a reference to the EPA Final Rule to the "References" section. There was no opposition.
4. Jim proposed changing the definition of Stationary Source Tester, Section 3.20, to reference "The organization or company..." instead of "Person or persons..." His rationale was that the Tester is typically an organization or company, not an individual. Michael Klein saw no need to change the definition. Paul suggested the definition be made consistent with Section 3.15, which uses the language "Person or organization..." Jim agreed with that suggestion.
5. Maria noted that in accordance with the committee's previous approval of the SSAS Table update, in which a footnote was added requiring that audit samples be within the SSAS Table concentration ranges, the second sentences of Sections 6.3.1 and 6.4.1 were struck, and a note was added to Section 6.4.1. There was no further discussion on these changes.
6. Jim proposed adding a timeframe of "two (2) business days" to Section 8.1 for the Provider to contact the Regulatory Agency to request specific requirements prior to shipping the audit sample. Currently, the standard only says that the Provider shall contact the Regulator, but does not say how much time is allowed for this to take place. Tom said that two days might not be enough time, and he would be comfortable with five days. Bob and Jim agreed with five days. Jim just wanted a timeframe to be specified, since now there is none. Jim moved to change his proposal to "within five (5) business days" for Providers to contact the Regulatory Agency. Paul seconded. A roll call vote was held, and all present voted in favor except Charles (no).
7. Also in Section 8.1, Jim proposed changing the allowed timeframe for Regulators to respond to the Provider from the current "fifteen (15) calendar days" to "seven (7) calendar days." DeAnna Oser and Michael Klein had previously e-mailed opposition to this change.

Gregg also prefers having 15 days. Stan pointed out that in smaller agencies, there may only be one employee reviewing SSAS orders - what happens when that person is out of the office? There may not be enough time for them to respond. Michael Klein moved that the timeframe for Regulators to respond to the Provider remain as-is at fifteen (15) calendar days. Charles seconded. A roll call vote was held, and all present voted in favor.

There was also discussion about use of business days versus calendar days. Paul thought that the days used (business or calendar) should be consistent. Maria suggested that a proposal to standardize on business or calendar days be made for the WDS after it is posted for public comment.

[7] Adjournment and Next meeting

Meeting was adjourned at 1524 HRS EDT. Next call is on 4-28-2014.