

TNI Stationary Source Audit Sample (SSAS) Expert Committee Special Meeting on August 18, 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	Absent
Paul Meeter, Weston Solutions (Stationary Source Tester)	Committee member	Absent
Bob O’Brien Sigma-Aldrich (Provider)	Committee member	Absent
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	Absent
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	Absent
William Daystrom TNI (IT Administrator)	Guest	Present
Andrew Chew EPA Region 9 (Federal Government)	Guest	Present
Brandy Hughes Alliance Source Testing (Stationary Source Tester)	Guest	Present
Clayton Johnson Maxxam Analytics (Laboratory)	Guest	Present
Rob Knake A2LA (Provider Accreditor)	Guest	Present

Maria Friedman called this special meeting to order at 1403 HRS EDT. There was a quorum present.

[1] Introduction and welcome

Maria explained that this public meeting was being held in order to present the Working Draft Standard of the TNI SSAS Standard, Volume 1, Module 3, which had been posted on the TNI website since 7-18-2014.

[2] Review of V1M3 WDS changes versus the current Standard

Maria reviewed the changes to the Standard reflected in the posted WDS:

Preface: Added paragraph 3: TNI developed these standards to fulfill the requirements established by EPA in Federal Register Vol. 75 No. 176 (75 FR 55636) September 13, 2010 “Restructuring the Audit Sample Program.”

Rationale: Citing the EPA Final Rule that provided the framework and basis for the TNI SSAS Program

Section 2.8 (References): Added reference to Federal Register Vol. 75 No. 176 (75 FR 55636) September 13, 2010 “Restructuring the Audit Sample Program.”

Rationale: Citing the EPA Final Rule that provided the framework and basis for the TNI SSAS Program

Section 3.2: Updated definition of Facility:

Facility: The responsible owner or operator for the stationary source or ~~their~~ its authorized representative.

Rationale: Grammar correction

Section 3.13: Updated definition of Stationary Source Tester:

Stationary Source Tester: ~~Person or persons testing~~ A person or organization that tests or collects samples at a stationary source of for atmospheric emissions.

Rationale: Clarify that a Stationary Source Tester may be a person or organization, not just a “person or persons.”

Section 4.0: Added Figure 1, Audit Sample Process Flowchart, taken from the Frequently Asked Questions (FAQ) posted on the TNI website. Also added accompanying notes 1-9.

Maria commented most of the notes originated from existing statements in the Standard. To eliminate potential confusion about whether the notes were new requirements or duplication of existing requirements, she proposed removing the notes (and updating the flowchart to remove reference to the notes as well). Charles objected to this change, saying it was better to preserve the notes and add citations to the sections referenced by the notes. Duplication would ultimately benefit more than it would confuse. Michael Klein and Gregg agreed the notes should be retained. Maria said she had a copy of the notes that included references to the sections.

Brandy pointed out an apparent inconsistency in the flowchart with regard to whether collection of audit samples is required in the field, versus Note 6 that says the Tester “must” ensure that the audit sample is available on-site when conducting the stack test. If the Tester must have the audit sample on-site, why does the flowchart have the question “is collection of the audit sample

required in the field?” Michael Klein said that the question of collecting audit samples in the field was written for methods such as Method 25. Charles added that one of the future steps of the SSAS Program would move toward more samples being collected in the field, not just for Method 25.

Discussion regarding Figure 1 Notes:

Note 1: Add a reference to V1M3 § 4.1.1 and 4.3.1. Mike Schapira asked if the note should include a link to a website that lists the required audit samples. It was agreed to include a link to the EPA website as well as a reference to the applicable sections of the standard.

Note 2: Stan asked if the Provider Accreditors had listed the accredited Providers on their websites. Rob Knake confirmed that A2LA had such a webpage. William said that the TNI website also has a page that lists the approved Providers with links to their Fields of Accreditation and a copy of the EPA table of required audit samples. Michael Klein said that if other audit sample programs (non-TNI) were created, someone reading the TNI Standard might look at the TNI website and not realize that other audit samples were available through non-TNI audit sample programs. Maria said that TNI’s standard is specifically for TNI, and if another organization creates an audit program, they would have their own standard. Charles said that for now, it was accurate to reference TNI since there were no other audit sample programs, and we can make changes to the standard later should that situation change, but he also agreed that we can link to the EPA website in the note. The consensus was to change Note 2 to link to the EPA website (the same link as in Note 1).

Note 3: No standard reference is needed.

Note 4: First paragraph: add a reference to V1M3 § 4.2.2. Second paragraph: Maria asked if the committee wanted to incorporate this paragraph into V1M3 § 4.2.2, then remove the second paragraph from Note 4. There was agreement to do so, with minor changes to the language (referencing analyte “values” instead of “levels” and changing the first mention of “analyte values” to “analyte requested values”).

Note 5: No change needed. The note already references V1M3 § 6.0.

Note 6: Add a reference to V1M3 § 4.3.2.

Note 7: No change needed. The note already references V1M3 § 4.4.

Note 8: Clayton pointed out that the flowchart box related to Note 8 does not match V1M3 § 4.4.2. The flowchart says that the Laboratory submits results to the Provider, while 4.4.2 says that the Laboratory submits audit sample results to the Provider and simultaneously submits audit sample and field sample results to the Regulator. The flowchart will be updated to include the requirement to send audit sample and field sample results to the Regulator.

Note 9: No change needed. The note already references V1M3 § 6.0.

Section 4.1.2: Maria proposed changing “Companies” to lower-case “companies.” No one opposed.

Section 4.4.2: Clayton said that his lab has received complaints from clients who do not want the lab sending field sample results to the Regulator. Maria said that if the client did not want the data sent to the Regulator, the client would have to obtain permission from the Regulator. Katie said that her lab submits preliminary reports to their clients, and when the client approves, the lab issues final reports and sends the results to the Provider and Regulator at the same time. Stan asked if the preliminary report included only field sample results and not audit sample results. Katie said yes, and added that clients had not requested changes to data after seeing the preliminary report; it was more for peace-of-mind for the client to see the results first. Michael Klein said it was ok for results to go to the client first, but once it went to the Provider for evaluation, the audit and field results had to be sent to the Regulator at the same time: the information is public information; it is not confidential. Maria asked if it was possible that a lab would change results after the client received the preliminary report. Katie said that it was possible if the client suspected there was a problem with the data, but such an event had not yet occurred. Mike Schapira said that his lab tells clients that they are required to send results to the Provider and Regulator at the same time, and the client would have to talk to their Regulator if they had an issue with that; participating in the audit program means agreeing to the stipulations in the standard. Katie asked if it would be ok for the Laboratory to supply the batching information for the field samples to the Regulators instead of the results. Michael Klein said that Regulators want to know the field sample values before the results of the audits are known, because they want to prevent the unlikely event of field results being changed because of the audit results. Maria pointed out that the requirement to simultaneously send results for the audit and field samples to the Provider and the Regulator originated in the EPA Final Rule.

Section 4.4.4: Maria proposed changing “The Laboratory may perform corrective action...” to “The Laboratory must perform corrective action...” Mike Schapira said that sometimes there is no corrective action required. Michael Klein said that with Method 25, the fault might be in the collection and not with the Laboratory. The consensus was to leave 4.4.4 as-is.

Section 6.1: As discussed in an earlier meeting, language was added to this section to require that Providers include, with their reporting forms that come with audit sample instructions, Regulator contact information and a link for submitting a complaint.

Section 6.1.1: As discussed in an earlier meeting, added a statement that complaints be submitted in writing.

[4] Adjournment and Next meeting

Maria said that the next meeting will likely be her last as Chair, since she has reached the limit of time she is allowed to serve. A new Chair will therefore be elected at the next meeting. Maria will remain involved as an associate member of the committee. Tom Widera had notified Maria by e-mail that he would like to submit his name in consideration as the new Chair, and Charles announced that he was withdrawing his name from consideration.

Meeting was adjourned at 1535 HRS EDT. Next call is on 8-25-2014.