

TNI Stationary Source Audit Sample (SSAS) Expert Committee Teleconference on December 8, 2014 - Minutes

Attendance:

Tom Widera – Chair ERA (Provider)	Committee member	Present
Charles Simon – Vice Chair VOC Reporting, Inc. (Laboratory)	Committee member	Absent
Mike Hayes Linde (Provider)	Committee member	Present
Michael Klein New Jersey DEP (State Government)	Committee member	Present
Theresa Lowe, Golden Specialty (Stationary Source Tester)	Committee member	Present
Paul Meeter, Weston Solutions (Stationary Source Tester)	Committee member	Present
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	Absent
Jim Serne TRC Environmental Corp (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
Maria Friedman – Test America (Laboratory)	Associate Member	Present
Andrew Chew EPA Region 9 (Federal Government)	Guest	Present
Steve Sidebottom, MO DNR	Guest	Absent
Josh Vander Veen, MO DNR	Guest	Absent

Tom Widera called this meeting to order at 14:06 HRS EDT. There was a quorum present.

The minutes for the December 8 call were taken by Gregg O’Neal. William will e-mail a copy of today’s recorded meeting after the conclusion.

- The November 13, 2014 meeting minutes taken by Tom Widera were reviewed.
 - Katie said typo on Page 2 first paragraph second sentence “tot his” should be changed “to this” and one more on the last page the 8th paragraph that starts “Charles mentioned that his may need to be visited” should be “Charles mentioned that this may need to be visited”
 - Stan said 9th paragraph that starts “Paul had asked Tom what information we send to the regulator once and audit request is received.” Should be “Paul had asked Tom what information we send to the regulator once an audit request is received.”
 - Jim moved to accept the minutes with the modifications discussed and Theresa seconded the motion. There were no oppositions or abstentions. The meeting minutes from November 13, 2014 with corrections were approved.

Tom provided an update on the voting on VDS V1M1 and V1M3 both modules were approved. He appreciates everybody getting on the web site and getting their votes in. There were no comments by any of the committee members. All of the committee members did get their vote into the web site. With both modules approved they both will be sent to William to be posted on the TNI web site as interim standards open to a 30-day comment period as none of the committee members commented during the vote.

Tom asked if William was on the call. No answer so it was assumed he was not present. Therefore there was not an update on the status of the SSAS Central Data Base on today’s call.

Tom had a quick input on the regulatory agency contacts issue from the last call. Tom said ERA is putting together an e-mail survey to try to get the agency contact information. In addition to plans to provide additional information and changes to the order forms to try to get some of this information quicker and up date the agency contacts to address the contacts issue. Bob O’Brien was not available on the call today to comment on what Sigma-Aldrich was doing to address the contacts issue.

Michael Klein brought up the topic question weather Method 30B for Hg might need audits and questioned if a Method 29 audit could be re-purposed to work as a Method 30B audit. Theresa Lowe stated that Method 30B does not require an audit since there is a field recovery test that is part of the method that has to be passed. When ordering the sorbet carbon sampling tubes they request the sample tube provider to also provide the spiked tubes with the same carbon used prepared the field sample tubes. The recovery standard is 85% to 115% ng/dscm. Jim stated that when EPA developed Method 30B they developed the method to be self-validating. He suggested talking to Robin Segal with the EPA for additional method information. Jim stated that since Method 29 audit is on a different medium and cannot be re-purposed. After the discussion both Michael and Jim agreed that Method 30B is self-validating similar to Method 18 and does not require an audit.

Michael Schapira submitted an e-mail to Tom about a topic question about re-using an audit across several sampling events for a single client. Question is should this be allowed and can the audit sample be used for additional testing? Michael asked are we talking about reusing or using the results for multiple tests? Tom said reusing since there are a lot of projects that come close

together however Michael said he did not feel he meant reusing since there is not enough material for a reanalysis. Katie said there plenty left for a reanalysis. Michael question does not the standard require the audit be sized without too much extra? Katie said typically there is plenty left over a sample is typically 20 ml diluted 10 ml to 1 L so a second dilution can be prepared and you will not use a full liter for the analysis. The regulator allowed re-analysis of a prior audit as a QC sample. Michael said the EPA standard gives the regulator the authority to waive an audit if reasonable to do so. Under the EPA audit program the audit result was valid for 30 days. But that this should be up to the regulator to approve an audit reanalysis. Tom asked does 30 days mean the sample or the result. Just the result is valid. Stan wanted some clarification as to what the original question was. Tom said Michael Schapira sales manager is asking about reuse of audit over multiple test projects. The concern is that multiple opening and dilutions can possibly damage the integrity of the sample. Both providers provide enough material for a reanalysis. Gregg mentioned the additional audit material is also needed in case there is a challenge of the audit value. Jim provided an example of a facility metal test fails one parameter and the regulatory agency and facility wants a new test ASAP. So the retest was performed without getting a new audit due to time for the second round of testing and to have the same audit for all the testing. Katie had a similar situation preapproved by the regulator where a prior audit was used as a QC sample. Gregg said the quality assurance sample validated the calibration curve. Katie said that was correct. Gregg this sounds acceptable. Michael said case by case with regulator approval. Gregg and Jim agreed case by case. Gregg said there is still the additional concern that the audit sample has been opened and there is the potential for contamination and not getting the same result with the audit material. Michael said if contamination is a concern then a new audit should have been ordered and expedited possibly sent direct to the lab still case by case. Katie indicated that the old PT samples are typically used as training samples for new hires and in the past appear to be stable. Tom said the audit has a 1 year guarantee un-opened but after it is opened it is subject to the handling conditions of the lab that the provider cannot guarantee the integrity past the original use as an audit sample. If there is a failure is it an analytical issue or a problem with breach of integrity with the sample. Gregg asked do we need a procedure for how to extend the integrity of an opened sample (i.e. good housekeeping rules). Stan did feel like a procedure was where we should be directing our efforts. Who is responsible if the second analysis if the audit does not pass. Gregg said reusing an audit as a QC sample is most likely for a compressed re-test situation and is essentially a waiver. If they fail it, it will be hard to throw out the test but if passed it validates their calibration. Michael is less comfortable with re-analysis than just waving the audit outright provided it was the same analysts and within 30 days. Tom indicates that time to get a new audit for the additional testing is not a problem for the sample providers with quick regulatory response. Paul said if the tester has sufficient time to request a waiver of the audit they the tester has sufficient time to request another audit. Gregg asked how do labs feel about QC vs. audit sample on short schedule. Katie said once it is a QC sample it is hard to get the lab to pay for a re-anaysis but that it does not make that big of a difference.

Maria Friedman joined the committee meeting to talk term limits

SSAS Expert Committee Membership (as of 12-8-2014)

Members	Organization	Joined	Term Expires Jan 1st	Representation
Michael Hayes	Linde	2010	2016*	Provider
Michael Klein	New Jersey DEP	2008	2014*	State government
Theresa Lowe	Golden Specialty	2011	2017*	Stationary Source Tester
Paul Meeter	Weston Solutions	2011	2017*	Stationary Source Tester
Bob O'Brien	Sigma-Aldrich RTC	2013	2016	Provider
Gregg O'Neal	North Carolina DAQ	2008	2014*	State government
Michael Schapira	Enthalpy	2009	2015*	Laboratory
Jim Serne	TRC Solutions	2009	2015*	Stationary Source Tester
Charles Simon (Vice Chair)	VOC Reporting, Inc.	2013	2016	Laboratory
Katie Strickland	Element One	2014	2017	Laboratory
Stanley Tong	EPA R9	2008	2014*	Federal government
Tom Widera	ERA	2013	2016	Provider

Balance:

- 3 Laboratory
- 3 Provider
- 3 Stationary Source Tester
- 3 Regulator

Subcommittees:

- Stationary Source Audit Sample Table Subcommittee

Program Administrator: None

*Non-renewable until after one year from expiration and subject to availability of vacancy in the committee.

Theresa indicated in January she will be probably be working as a government worker. Maria said she will need to reapply. Since we are short on applicants for the committee there will be a one month exertion on terms till January 2015. Maria will forward application information to recruit new members.

The next SSAS Expert Committee Call will be Monday, January 12, 2014 at 2:00 PM Eastern

Meeting was adjourned at 14:55 ET.