

TNI Stationary Source Audit Sample (SSAS) Expert Committee Teleconference on August 25 2014 - Minutes final

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	Absent
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	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	Absent
Tom Widera ERA (Provider)	Committee member	Present
William Daystrom TNI (IT Administrator)	Guest	Present
Brandy Hughes Alliance Source Testing (Stationary Source Tester)	Guest	Present
Rob Knake A2LA (Provider Accreditor)	Guest	Present

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

- Maria mentioned that Deanna Oser has transferred out of source testing and can no longer participate in the SSAS meetings.
- The July 14, 2014 meeting minutes were reviewed.

- Both Theresa Lowe and Paul Meeter indicated that they would like to participate on the SSAS Table sub committee.
- In Section 4A, the word “chair” needs to be added to the end of the statement.
- In Section 4i i the words “be a meeting” needs to be added to the end of the statement.
- In Section 4 c i – Maria discussed changing the reference to “methods” to “method and technology”. Gregg was concerned that if the standards are re-written, does this affect the SSAS database on the back end. Maria responded that if approved the SSAS database will be changed to accommodate.
- Mike Schapira moved to accept the minutes with the modifications discussed. Gregg O’Neal seconded the motion. There were no oppositions. Tom, Katie, and Theresa abstained. The minutes from July 14, 2014 were accepted.
- The August 18, 2014 special meeting minutes for Volume 1 Module 3 were reviewed.
 - Michael Klein commented, via email, that on Note 1 the word “to” needs to be added between the word “link” and “a”.
 - Mike Schapira moved to accept the meeting minutes with the listed modification. Charles Simon seconded the motion. There were no oppositions. Tom, Theresa, and Paul abstained. The meeting minutes from August 8, 2014 were accepted.

Chair Update

- Maria thanked everyone for the opportunity to chair the SSAS expert committee. She indicated this would be her last call as chair.
- Maria indicated she will explain all the details to the new chair. As the SSAS committee has no program administrator, the duties of recording the minutes will be performed by the committee members. Maria will forward the list of persons responsible for the minutes to the new chair.
- Maria said she will notify the EPA of the new chair.
- Charles nominated Tom Widera to be the new SSAS committee chair. Mike Schapira seconded. The motion was voted. There were no oppositions or abstentions. Tom Widera will be the new SSAS Committee chair.
- Maria mentioned she will continue her support as an associate member, but due to commitments as the PT committee chair she may not be able to attend all calls.

Review of Volume 1 Module 1 (Discussion of change of labs)

- An issue was raised by ERA that sometimes audit sample results are reported by laboratories that were different from the lab identified when the order was placed.

- Maria added to sections 8.1 c and 11.1.1 the requirements for when there is change in the lab selected by the facility.
- Tom raised the issue that if the provider has 2 business days to notify the regulatory agency and the regulatory agency has 3 business days to respond to the provider, then there is a risk that reports will not be submitted to the associated parties within the required 3 business days.
- Maria responded that the providers will have 3 business days from when the regulatory agency responds to submit final reports.
- Charles indicated that the statements in 8.1 c and 11.1.1 puts the burden on the providers and the regulatory agency. Charles felt this is the wrong approach and that the burden for the change should not be placed on the provider and regulatory agency but instead on the facility who made the change.
- Maria responded that this is addressed in Volume 1 Module 3 and that there was an addition to section 4.1.2.1 requiring the facility to inform the provider. Maria asked Tom if this situation is still occurring and Tom indicated that it was.
- Charles was wondering why the provider needs to seek approval from the regulator for the change in labs.
- Mike S. indicated that the bigger issue is that the provider shouldn't be sending the same audit sample to the same lab more than the required number of times and that the change in labs could cause that very situation.
- After discussion, Maria indicated that the notes should remain. She also indicated that the provider would not be held non-compliant and that it would be up to the regulatory agency to determine if they would accept the data due to the change.
- Katie indicated that telling the provider of the lab change prior to submitting the results would already be too late. At this point the lab has more likely than not already analyzed the samples. Katie indicated that the notification should come prior to the facility shipping the samples to the new lab and not prior to the results being submitted to the provider.
- Charles agreed, noting that the provider can then determine if the new lab has exceeded the maximum number of times they can received the selected audit sample.
- Charles added the comment that section 8.1 should begin with the statement the "Audit samples are lab specific" and that the statement should be repeated several times in the standard, especially added to section 11.1.1. Maria indicated she would add an "a" to section 8.1 to add this information. She added that if the proper paper trail is followed then the regulatory agency can determine whether they will accept data if the frequency of receiving audit samples by a lab is exceeded.
- Mike S. asked Tom if the situation has ever arisen where samples were sent twice to the same lab as a result of the lab change and Gregg asked if the issue of changing labs was a

pattern with specific testers. Tom indicated that he was not sure but would check with his reporting group.

Discussion of Volume 1 Module 3

- There was a change made in the flowchart. In note 8, there was an addition to indicate that the results would also be sent to the regulatory agency.
- The decision diamond that follows addresses the change in laboratory that was discussed earlier in the meeting.
- Katie indicated that section 4.2.1 should be re-worded to notify the appropriated parties prior to submitting samples and not prior to the reporting of results. Gregg asked Katie if the lab is specified on her paperwork when they receive samples. Katie indicated that it is. Currently if her lab catches this they will notify the provider, but feels if it is written into the standard then it would get caught prior to the samples being received by the lab.
- Maria will modify Section 4.1.2 to indicate that the facility will send samples to the lab identified in the original order. A second section will be added to indicate that the facility will notify the provider of changes in the lab prior to submitting the samples to the new/alternate lab.
- Maria indicated she will clean up the V1M3 and then send for approval. There will then be a 45 day period for approval. Any comments on this module should be sent to Tom for addressing at the next meeting.

Message from Michael Klein

- Michael Klein sent via email a message he wanted read and included in the meeting minutes.

“Maria, I wanted to thank you for your leadership of the TNI expert committee. A lot has been accomplished and much of it is due to your dedication in seeing this program get off the ground”.

Final Note from Maria

Maria encouraged anyone who is interested to join the PT committee as a member or associated member. Maria also indicated that she would be available to answer anyone's questions.