

TNI Stationary Source Audit Sample Expert Committee Conference Call Summary December 8, 2008

Participants: Maria Friedman (TestAmerica), Richard Swartz (MO DNR), Ray Merrill (ERG), Gregg O'Neal (NCDAQ), Stanley Tong (EPA R9), Jack Herbert (OR DEQ), Shawn Kassner (ERA), Jane Wilson (Program Administrator)

Review of December 1st meeting summary

The December 1st meeting summary was approved as written.

Chair Update

Committee was reminded that all technical comments/details that remain to be addressed in the three WDS will have to be set aside for future deliberation (in the TNI Miami forum and in the committee's subsequent meetings/teleconferences). Only comments re. consistency and clerical corrections were addressed during this meeting.

Development of Working Draft Standards

Comments to the three WDS, received via email, were discussed for consideration as follows. Consult the appropriate emails for details regarding the comments:

From Richard Swartz:

Part WDS

- Drop "operational" in sections 1.1 and 1.2; rephrase section 1.2 for clarity – **accepted**
- Why regulatory agencies not explicitly included in Scope in section 1.2 – **requirements should not be imposed to regulatory agencies, as previously discussed and supported by Candace**
- Remove "audit" in section 1.3 – **accepted**
- Choose one term when referring to stack test; affected sections 4.1.4, 4.2.3, 4.3, 4.4.2, and others within the other two WDS – **use "stationary source test"**
- Choose one term or acronym when referring to audit samples; affected section 4.2.2 and others within the other two WDS – **use "SSAS"**
- Why is it stated in section 4.2.3 that regulators can provide input to facility after the test, when regulators can exercise this function anyway, by default – **no changes made; being explicit helps**
- Use of "data report" in section 4.3.5 ambiguous – **"data report" retained but added after it a qualifying phrase "as defined by the regulatory agency"**
- Rephrase section 4.4.1 to separate SSAS from test plan – **rejected; SSAS is part of test plan. Shawn commented that EPA is writing regulation that will address specifics for test plans (and this includes SSAS), as was previously mentioned by Candace**

Pro WDS

- Definition of SSAS Program in section 3.6 to include providers and provider accreditors – **set aside for future deliberation**
- Remove “SSAS PA-accredited” in section 4.4 – **accepted**
- Replace “regulatory bodies” with “regulatory agencies” in sections 5.4.1 and 5.5 – **accepted**
- Pluralize “participant” in section 6.1b – **accepted**
- Remove “final packaged” in section 7.2.3 – **rejected; retain usage**
- Grammar change in section 7.3.1 – **accepted**
- Question whether PT Board has to wait for completion of SSAS final report and evaluation prior to receiving results of the provider’s assigned value verification, homogeneity, and stability testing for any SSAS/analyte, in section 7.4.3 – **answer = yes, PT Board has to wait**
- Remove “permitted” and replace “compliance test” in section 8.1.1, with a term consistent to three WDS – **accepted; use “stationary source test”**
- Replace “audit sample” in section 8.1.1 a & b with a term consistent to three WDS – **use SSAS**
- Rephrase section 8.1.2 for clarity in re. to providers’ instructions to be sent with each SSAS - **accepted**
- Replace “their data” with “the data” – **accepted; “the data” implies generality; “their data” implies specificity**

From Jack Herbert

Part WDS

- Add technical details in section 4.1.4 (e.g., reporting units) - **set aside for future deliberation**
- Rephrase section 4.2.3 based on details to be added to section 4.1.4 - **set aside for future deliberation**
- Add statement in section 4.3.3 re. SSAS that must be collected during stationary source test (not just analyzed) – **accepted**

Pro WDS

- Add technical details in section 8.1.2 based on proposed addition to section 4.1.4 - **set aside for future deliberation**
- Attestation statement for providers – **to be reviewed by Ray and Shawn; must send comments to Maria by noon on 12-9-2008**
- Include in providers’ instructions in section 8.1.2a how to connect sampling equipment to SSAS containers – **rejected; the term “handle” already in the section will address this concern. Ray commented that when his company provides Method 25 and Method 18 audit samples, instructions re. use of specific fittings are defined.**
- Replace “stack test” in section 8.1.2a with a term consistent to three WDS - **use “stationary source test”**
- Add “and/or analyzed” after “collected” in section 8.1.2e – **accepted**

From Maria Friedman

PA WDS

- Remove "materials" in section 3.1 – **rejected**
- Replace "materials", in section 3.2, with "reagents and equipment" – **rejected; “materials” will include filters, for example.**
- Rephrase opening statement in section 4.1.1 for clarity, with "Define SSAS requirements for content, including:" – **accepted**
- Replace "SSAS PA" with "SSAS provider" in section 5.3.1d – **rejected; original usage correct**

All other clerical corrections will be handled offline. Jane will request TNI's admin personnel to help in formatting. Maria also reminded committee that voting will occur in the next day or two.

There being no other items, the meeting was adjourned.

The next meeting is scheduled for **December 15 at 2:00 pm EST.**