

TNI Stationary Source Audit Sample Expert Committee Meeting
October 14, 2009

Participants:

Committee members –
Maria Friedman, Chair
Richard Swartz, Vice Chair
Gregg O’Neal
Michael Klein
Jack Herbert
Mike Schapira
Jane Wilson, Program administrator

Associate members –
Mike Miller

- 1) Double-check of documents to be referenced in this teleconference

Maria confirmed only the agenda and October 5 minutes are needed for today.

- 2) Review and approval of minutes from teleconference on October 5, 2009

A correction was made to a date in item 4 d) and an attribution was corrected to Gregg O’Neal in the discussion for container type (second paragraph from the bottom of page 3).

Gregg motioned to accept as amended/Mike Schapira seconded. All were in favor.

- 3) Chair update

Maria talked to Jerry about potential fees associated with accessing the central database. Jerry confirmed there would be a fee, but it would be nominal in scale (for example \$10 annually). The fee would support the ongoing maintenance and development of the database. Details such as whether the fee applies to regulators, or on a per person basis have to be developed. The fee would offset existing funding that will eventually be exhausted. TNI could also structure it as a “per use” cost.

Maria noted that with the completion of the standards the committee’s focus will be shifting to development of the SSAS guidance document. Maria will compile a list of items to be addressed in the guidance document from her notes and asked the committee members to make their own lists based on their notes and suggestions for what needs guidance developed for all the SSAS participants.

- 4) Continue voting on the addition of field "Container type" into the SSAS Central Database

All on the call except Mike Schapira were at the last meeting, but Mike was not able to review the discussion thoroughly before the meeting. Maria will follow up with those on the committee that have not voted on this proposal.

- 5) Continue discussion on who enters "Other Data" into the SSAS Central Database

Email discussion took place between the regulatory members of the committee. Gov't reps agreed that they are being encouraged to privatize and data entry isn't a role they can take on. It also represents time they can't spend on reviews, etc. The Provider or Tester could do it. The "other data" are not confidential. It would simplify the process to have the data all entered at one time by one entrant. The Provider could enter it, but they will need a way to get it, such as the dates when testing started and stopped. Testers and lab could provide an information sheet that includes the needed information as well. Samples coming from the field will need chain of custody for the audit sample.

The committee discussed how regulator comments will be handled. For example, if the regulator observes the sample collection is not performed correctly, the audit sample is invalid. There could be a checklist of standard comments for consistency. It shouldn't be something for the Provider to enter and regulators should take responsibility for it. Shawn had indicated in prior discussions that the Provider cannot do this function. Gregg questioned whether regulator comments need to be included in a private program. The regulator is using data from the program, but the comments should not become part of the private data record.

William also provided comments to the discussion. Currently in the EPA database there is no place for comments. Perhaps the comments should be available on the regulatory side only, and not be publicly available. Having someone else beside the regulator enter the comments could make the cost go up as well. Is the information useful to anyone else?

Other data categories are on listed in the Aug 11 meeting minutes:

Other Data

- Start of sampling event
- End of sampling event
- Collector ID (or Stationary Source Tester ID)
- Stationary Source Tester Project ID
- Regulator Comments

How does the collector ID get assigned (not determined yet). How will this be controlled over multiple Providers? Will the Provider have to determine it or will

the database create it? When someone sends in the data, how does the regulator match it up with the report. Does the combination of Tester ID and Project ID provide a unique identifier? The Project ID will have to identify specific project details and test events – may add this to the guidance document.

Gregg motioned to add “Other Data” except regulator comments to the Provider data. Jack seconded. Maria noted that a provider representative is not participating on the call during this discussion. Mike Miller provided some comments based on PT experience. The four items other than regulator comments are relevant to the audit sample itself, so a Provider should be ok with handling that data. Maria stated the committee should seek input from Shawn and Ray as to whether these are data they can handle. It was also noted that these data are not mentioned or defined in the standard itself. There are limitations as to the responsibilities that can be placed on different entities in a private program. The alternative is to have each participant enter the data for their part of the activity, but as William indicated, this is not feasible at this time. This item is tabled for further discussion at the next meeting after Provider input is sought.

For the proposed field “regulatory comments”, the committee discussed what role it has in the database. Worded comments will not be searchable unless they are standardized. Regulatory agency comment entry into the database makes them legally responsible. Could there be unintended effects such as influence as to whether a tester/lab can get hired for SSAS work? TNI should determine whether it wants to have these comments in the database or do they establish a disclaimer stating that they are not responsible for them. Would comments help qualify some issues such as failures/misunderstandings about how to analyze particular samples? If it is a more general comment field (e.g., any participant can enter a comment), it would have to identify the comment enterer. Could it note whether a complaint is being investigated, or is there a way to flag these situations?

The committee felt that more discussion is needed as to the value of comments, particularly among regulators. Maria asked the regulators to discuss off line and be ready with a recommendation for next Monday October 19th for discussion.

Next meeting October 19th, 2:00 pm EDT.