TNI Stationary Source Audit Sample Expert Committee Meeting
November 9, 2009

Participants:
Committee members –
Maria Friedman, Chair
Richard Swartz, Vice-chair
Mike Schapira
Jack Herbert
Gregg O'Neal
Jane Wilson, program administrator

Associate members –
Shawn Kassner

Guests
Jeff Lowry

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

Maria confirmed the documents for review today – agenda, November 2 minutes, and guidance document notes were emailed earlier on November 9.

2) Review and approval of minutes from teleconference on November 2, 2009

Gregg noted a correction to the spelling of his name was needed in item 2).

Gregg motioned to accept as amended/Richard seconded. "Yes" votes were cast by Mike, Richard, Gregg, Maria. As a quorum was not present, Maria will request votes by email for the remainder of the Committee. The minutes were subsequently approved as amended via email.

3) Continue discussions re. Guidance Document for Participants

The discussion will focus on items without organized responses and where additions have been made since the last meeting.

Item 14 How do I create a Stationary Source Test Project ID?

Maria incorporated the response from William on how to create a project test ID. Gregg has seen ID numbers that are as long as a credit card number. William's recommendation is that up to about 10 characters is manageable, and lengths over that may start to impact certain aspects of the database. Shawn added currently a 25 character field limit is used for some of their PT applications. Mike S. routinely sees IDs in the 15-18 character range.

Maria asked that regulators search out what is currently being used in terms of the length of project test IDs. Maria will do additional follow up with William. Jack added that the committee should determine what other information needs to be communicated about the project ID, for instance where should it be listed.

Item 15 Which reports are available via the SSAS Central Database and who has access?

This is an item that requires further discussion. Reports could be based on the reports that are currently available through the EPA database, or others that may be needed. The Committee cannot finalize the answers to this question without more information about the central database. The FAQs may have to be issued without this question initially. The database may take more time to develop and the Committee can update the FAQs later with information on access to the database.

Item 16 How do I access the SSAS Central Database?

Same issues as Item 15.

Item 17 Are the necessary ancillary equipment available (e.g., cga350, for Methods 25 and 18)?

A typo was noted to the spelling of “equipment”.

Other suggested FAQs from Stan – the Committee reviewed to decide whether to include these.

1. *Are there special storage and handling requirements for the audit sample? (particulate/liquid/gas samples) temperature/hold times*

The Committee recommended this FAQ be included.

Instructions will be provided with each audit sample. The SSAS provider is required to provide this information with each order. For specific details or concerns, please contact the audit sample provider.

2. *Do audit samples get shipped with a tracking number (e.g., Fedex/UPS number?)*

The Committee recommended this question not be included – this information is readily available from the provider.

3. *What types of tests require audit samples? e.g., Initial tests to demonstrate compliance with NSPS/NESHAPS? Retesting if initial test exceeded emission limits? Retesting if failed an audit test? Periodic*

testing (e.g., every 5 years under Title V?) EPA enforcement related tests? State Implementation Plan (SIP) rules? Relative Accuracy Test Audits (RATAs)?
Possible Answer: (?): consult your Regulatory Agency - outside the scope of this FAQ - TNI standards deal with audit sample providers and supplying of audit samples, not when and under what conditions are audit samples required.

Some of this content might be good for the guidance document introduction. Some of this may be covered in the draft EPA regulation. Maria noted the need to spell out NSPS, etc. for clarity – Jack will supply information on the acronyms. The committee agreed the response to this FAQ is to contact the regulatory agency.

Item 2 <u>What is a quality control (QC) sample?</u>

Chuck W. is going to provide addition detail.

Item 3 <u>How do I find a Provider?</u>

List of accredited providers should be on the A2LA website and TNI website (similar to the PT program).

Item 13 <u>Is there a flow chart to illustrate the audit sample process from beginning to end?</u>

Richard will take the lead on developing a flow chart and checklist with the other regulators. Items to include on the checklist include determining concentration ranges and creating the project test ID per prior discussion. Maria asked that the recommendation be provided for the November 23rd conference call. The flowchart/checklist will address all participants – facilities, testers, regulatory agency, etc.

Item 6 <u>How many audit samples should I order? Does one audit sample apply to more than one test? For a test for 10 different sources, are the Facilities required to purchase one audit sample, or are they required to purchase 10 audit samples (one per source)?</u>

Maria noted that recommendations from Michael Klein have been included in this section. Jack raised an issue that item 6b should be more specific and explain that the samples should be processed together, same day, same analyst, etc. Maria asked Jack to send his suggested addition in an email. Shawn suggested adding “calibration range” or “same analytical batch”.

Maria suggested adding reference to specific statements in the standards, such as 4.4.1, volume1 module 3.

Item 7 What if a Facility fails to order audit samples and the Regulatory Agency does not intervene?

The committee reviewed the proposed response from Stan (also to cover Item 8).

Gregg asked whether this should be in the guidance document, as it covers specific regulatory issues. It's also not something addressed by the SSAS standards. If anything is included, it should be brief and direct the user to the regulatory agency. The committee suggested the following:

"The failure to order an audit sample should be discussed with the Regulatory Agency."

Same response for Item 8.

Introduction disclaimer language review:

This language was proposed by Stan based on language used in EPA documents. Some parts were deleted as not applicable. Maria suggested keeping the statement about periodic revision without public notice. Jack suggested not including "periodic" since it implies a specific schedule. The introduction should emphasize that the current versions of the standard are the default for program requirements, not the guidance document.

Maria will update the FAQs again based on today's discussion. In 2 weeks the committee will review the proposed flow chart/check list. After those items are done, the committee will return to work on the central database.

The permission matrix (related to Item 15 in FAQs) will be discussed next week. Shawn asked about starting to work on next version of SSAS table since the limits are incorrect. The intent is to replace the current table when the new EPA regulation is in effect. Shawn and Jeff Lowry asked that the subcommittee that worked on the SSAS table be reconvened. Maria will contact the PT Board chair about this issue.

Maria reminded the committee that any votes on the modified VDS documents are due by November 12th. Next meeting is on Nov 16th.