

TNI Stationary Source Audit Sample Expert Committee Teleconference
April 5, 2010

Attendance:

Maria Friedman, Chair	Committee member	present
Michael Klein	Committee member	present
Ray Merrill	Committee member	present
Gregg O'Neal	Committee member	present
Michael Schapira	Committee member	absent
Jim Serne	Committee member	present
Candace Sorrell	Committee member	absent
Richard Swartz, Vice-chair	Committee member	present
Stanley Tong	Committee member	present
Jane Wilson	Program Administrator	absent
Shawn Kassner	Associate member	present
Mike Miller	Associate member	absent
Ty Garber	Associate member	absent

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

Maria noted that all documents for this call were sent via email on 4-1-2010. All confirmed receipt of the email.

- 2) Review and approval of minutes from teleconference on March 29, 2010

Gregg moved to accept as drafted/Jim seconded. All were in favor.

- 3) Chair Update

Maria reported the email response from Candace regarding the questions posed to the EPA: (1) Is the April 30th tentative deadline to finalize proposed changes to the CFRs still feasible? Answer – new target date is May 30th; (2) After CFRs are finalized, how long or when is implementation date? Answer – unknown at this time; Candace will seek answer from other authorities in EPA and respond back to Maria. Additionally, EPA was notified that the TNI SSAS FAQ will include reference to the EMC website for questions regarding applicability and enforceability.

Stan reported that, in general, implementation of new rules is 30 days after publication of those new rules. However, timing could vary from 'immediately' to 60 days, depending on how big or small are the changes.

Ray joined the call at this time and was briefed on the agenda items just completed.

- 4) Resume discussion re. SSAS FAQ

Maria reminded everyone that one of the goals for today's call, as mentioned during the last call on March 29th, is to finalize the SSAS FAQ. Everyone was requested to go over the latest revision to the SSAS FAQ (dated April 1, 2010) and provide further comments, if any.

FAQ #5 – Michael Klein proposed to amend the response to FAQ #5, as follows, for clarity: add phrase “use of one” in the second clause, for the response to read: “The TNI SSAS Standard does not require use of a COC, but use of one is recommended.”

FAQ #10 – Ray wanted to clarify intent in the question, whether it should be about availability of the ancillary equipment or whether ancillary equipment is necessary. An amended FAQ was proposed: “Is ancillary equipment necessary for Method 25 and 18 audit samples?” Proposed responses could state that cylinders are supplied with CGA350 fittings, or fittings compatible with CGA350 stainless regulators may be used, or that a step-down regulator will be required for high-pressure cylinders.

Gregg thought that reference to ‘350’ need not be mentioned since other types of fittings may be required in the future. However, Ray indicated that this type of fitting is defined in the regulations so the requirement will not just change without a change in regulations. Jim added that Testers are required to have or use compatible ‘350’ fittings and there could be Providers supplying (renting) them with the audit sample cylinder at additional cost, or vendors could sell them. Gregg noted that bags may also be used in place of cylinders, or that audit samples may be transferred to bags. In the latter case, flow regulators will still be needed to retrieve sample from cylinders. Ray read to the committee the EPA’s requirement for handling cylinder samples for Method 25. A similar requirement should hold for Method 18. The committee decided to indicate the use of a step-down regulator in the response to FAQ #10.

No further comments were received regarding the other FAQs. Prior to the motion and voting, Jim reported that SES submitted a request to EPA to provide guidance regarding the audit sample program. He understands that there are limits to TNI’s authority, so the FAQ document as-written is good.

Ray moved to accept the SSAS FAQ with the current revisions; Jim seconded. Maria requested a roll call vote. All 7 voting members present approved. Maria will send to all a clean version, complete with cover showing revision number and revision date, and then request Jane to have it posted on the TNI website.

Prior to adjournment, Stan reported that there would be dollars available to continue EPA’s SSCAP to June 2010. Ray added that their contract with EPA was approved up to April 30th; he will let the committee know if extended. Michael Klein also added that he is ordering audit samples for use in May. Ray agreed that it would be better to use all audit samples in stock than throw them in the waste.

Michael Klein noted that EPA still has to approve the TNI SSAS Program before it can be implemented. Ray recalled that Candace had mentioned that EPA would approve since TNI is the only existing volunteer consensus body, at the moment, that the proposed rules allow. Maria commented that the topic would be a discussion that should be left between TNI and EPA.

Next meeting is on April 12th 2:00 PM EST, to hear William's report regarding developments to the SSAS Central Database.