

TNI Stationary Source Audit Sample Expert Committee Teleconference
March 22, 2010

Attendance:

Maria Friedman, Chair	Committee member	present
Jack Herbert	Committee member	present (for roll only)
Michael Klein	Committee member	present
Ray Merrill	Committee member	present
Gregg O'Neal	Committee member	present
Michael Schapira	Committee member	present
Jim Serne	Committee member	absent
Candace Sorrell	Committee member	absent
Richard Swartz, Vice-chair	Committee member	present
Stanley Tong	Committee member	absent
Jane Wilson	Program Administrator	present
Shawn Kassner	Associate member	absent
Mike Miller	Associate member	present
Ty Garber	Associate member	present
Mike Hayes	Guest	
William Daystrom	Guest	
Jim Presley	Guest	
Frank Jarke	Guest	present

Jack announced that he is resigning from the SSAS expert committee due to other agency commitments. He hopes the committee can complete its immediate work and then focus attention on improvements in the production of audit samples and program expansion. He thanked the other committee members for their efforts.

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

Maria noted that documents for this call were sent via email on 3-19-2010 and the March 15 meeting minutes by Jane on 3-22-2010. All confirmed receipt of the emails.

- 2) Review and approval of minutes from teleconference on March 15, 2010

Mike Schapira moved to accept as drafted/Gregg seconded. All were in favor of the motion.

- 3) Resume discussion re. SSAS FAQ

Maria asked if there were any updates on the approval of the EPA new rule. None of the regulators has heard anything new. Ray said ERG had not gotten any extension for provision of audit samples past April 30th as well, **although ERG is filling orders for tests to be conducted in August.**

The committee resumed review of the FAQs/flowchart based on the prior week's discussion. Proposed changes are in red. Maria suggested the committee review the FAQ disclaimer language later, as TNI is developing an SOP regarding development of guidance documents that will include a TNI specific disclaimer.

She noted the addition of new Q4, which she drafted in response to a question from a potential SSAS program participant. Maria elaborated on the question.

Maria reiterated the concerns regarding enforcement and applicability raised by EPA in Candace's previous email and as discussed the previous week. She suggested three potential alternate questions that could be added to the FAQs:

Where can I find information about the EPA program?

Where can I get answers about enforcement and compliance?

Who can I contact regarding applicability and compliance issues?

Maria's suggestion for the answer is to direct users to the EPA website and Candace's name as the contact. Changes in the general EPA program provisions come out of Candace's area and there should be a link to this information and Candace's contact information on the EPA site.

Mike S suggested having this information in the FAQ document disclaimer and at end of FAQs as well for emphasis. This will be part of the disclaimer discussion.

Flow chart review:

Note 1 – Is a statement about regulator involvement needed in the note? The committee agreed to amend to indicate the recommendation to make the decision in consultation with the responsible regulator. It was suggested to change the wording to “The TNI SSAS program recommends...”

Note 2 – Amend to add that TNI website will have list of accredited Providers as well as A2LA website.

Note 3 – Keep as is.

Note 4 – Keep as is – this note paraphrases language from the TNI standard on the topic of ordering the audit sample and provides explanation.

Note 5 – Keep as is – refers to requirements in the TNI standard.

Note 6 – Keep as is – Vol 1 Mod 3 section 4.3.2 is the reference for this requirement.

Note 7 – The committee discussed possible changes to this note. It was suggested to add a second sentence about the handling/storage of the audit sample, etc. that would be separate from the analysis instructions. Provider instructions are mandated in Vol 1 Mod 1 section 8.2e and a reference could be added. Ty asked whether the labs are likely to read the Provider standard since it won't apply to them. A more generic statement was suggested by Maria – “Additional instructions from the Provider must be followed.”

[Gregg had to leave the call at this point.]

Note 8 – Keep as is.

Note 9 – Keep as is.

Flowchart itself: Keep as is.

Q3 – It was asked if A2LA is only Provider Accreditor. They are the only one recognized by TNI so far.

Q4 New FAQ – It was suggested to clarify who “we” refers to in the question, e.g., is it the laboratory, etc. Wording should refer to the lab being accredited rather than certified. The committee discussed whether it would be better to drive this question to the individual states, since the accreditation requirements are determined at that level and not by TNI. It was also suggested to take the NELAC accreditation reference out of the answer. Maria added this FAQ was due to an inquiry from one participant regarding their question about the need for NELAC lab accreditation.

Maria invited committee members to submit other comments via email by Friday March 26th ahead of the March 29th meeting. Review of the FAQs will start with proposed Q4. Maria will ask Shawn to provide an update on the SSAS table subcommittee progress. Maria is also following up with prospective new committee members.