

TNI Stationary Source Audit Sample Expert Committee
Teleconference Meeting April 13, 2009

Committee members present:

Maria Friedman
Gregg O'Neal
Jim Serne
Jack Herbert
Richard Swartz
Michael Klein
Ken Eichelmann
Jane Wilson (program administrator)

Associate members present:

Shawn Kassner
Mike Miller
Yves Tondeur
Gary McAlister

The minutes of the March 30, 2009 conference call were approved via email prior to this meeting.

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

The April 7, 2009 versions of the Voting Draft Standards (VDS) will be fixed references going forward through the review of the remaining comments. All comments have been consolidated into the spreadsheet dated April 12, 2009.

- 2) Resume review of Participants WDS – start at Line 4 (last line)

This also relates to Line 21 of the Participants Internal comments. The committee revisited the language regarding participant involvement in ordering the SSAS as it relates to the Participant and Provider documents. The comments received seem to be addressing two different things. The facility may send the testing plan to the regulatory agency before the provider has been identified.

Since the Facility orders the sample, the committee discussed whether the provider should be responsible for confirming the audit sample was approved by the regulatory agency. There is a need for confirmation from the provider that identifies the audit sample order that can be referenced in correspondence about the order. The committee concluded the issue is adequately covered in the Provider document and in 4.1.1 in the Participant's document. Ken motioned to remove section 4.1.3 of the Participant document – Gregg second. All were in favor.

Review continued with Line 20 of the Participants Internal comments sheet.

Line 20 – Section 4.1.3: The comment related to the 15 days allowed for approval of the audit sample request. Maria asked the regulatory participants whether approval of the audit sample will be handled separately from the test plan review. Some states allow up to 60 days for test plan review, so test plan review can precede sample order by a significant time. It will have to be a 2 step process, as the provider may not have the sample available.

Does there need to be anything about changing test plans and needing to update the regulatory agency? Richard thought this is pretty well understood already and does not need to be addressed in the standard.

Line 14 – Section 4.0: The comment suggested rephrasing the current language. Jack motioned to recommend incorporating the suggested change – Gregg second. All were in favor.

Line 16 – Section 4.1.2: The committee discussed whether the phrase about labs analyzing the audit sample is needed as it is already implied they will be doing the analysis. The Provider does need to get this information at some point. The committee decided to add “... and identify all the stationary source testers and laboratories participating in the stationary source test”.

Line 17 – Section 4.1.2: The committee decided not to make this suggested addition.

Line 19 – Section 4.1.2: Shawn asked how things work at the regulatory agency level, e.g., is there a dedicated contact per sampling event. The requirement to identify the contact person at the regulatory agency needs to be added and it should be a specific name. Jack moved to make the addition – Ken second. All were in favor.

Line 2 – The committee needs to find a place for the suggested text to be added. Between 4.3.4 and 4.3.5 may be the best spot. Jim commented that for many reasons, it is not desirable to stop a test run to perform an audit sample. It was suggested that the “(e.g., between test runs)” phrase be deleted both in this document and the Provider document. The committee agreed unanimously to that change.

Line 3 – A general comment was received that the Participants document should be a standalone document. The committee agreed that is already the intent. A guidance document that is more explanatory could be helpful. Participants are not likely to read the Provider or PA volumes. The guidance document can provide a roadmap to find requirements and references back to the other standards.

Line 4 – Section 1.2: The comment suggested that regulatory agencies should be added to the list of Participants. The committee agreed to incorporate. Jack motioned – Richard seconded. All were in favor.

Line 5 – Section 2.0: The committee thinks the EPA guidance document was going to be updated to include discussion of audit samples and calculations. Richard will contact Candace/Gary about this. The reference is still applicable because of the reference to test plans.

Line 6 – Section 3.0: The comment suggests the addition of a new definition for “stationary source test” (which may need to be added to other standards too). Michael Klein is aware of a source for a definition. A definition for “stationary source” is needed too.

Line 7 – Section 3.0: Definition for stationary source tester can be “Team of people testing a stationary source for atmospheric emissions.” This will refer to “stationary source” definition from Line 6.

Line 8 – Section 3.0: The definition of “participants” will now include providers and regulatory agencies. The term “participants” is used in all the modules. This should be added as applicable to the SSAS standards. Gregg motioned to add – Richard seconded. All were in favor.

Maria asked for comments on Line 9 for the definition of “laboratory”. The committee should email comments to Maria and Jane by Weds. 4/15.

Participants internal comments document, Line 10 is start of next meeting.

Next meeting April 20th at 2:00 pm EDT.