TNI Stationary Source Audit Sample Expert Committee Teleconference
April 4, 2011

Attendance:

Maria Friedman, Chair	Committee member	present
Mike Hayes	Committee member	present
Michael Klein	Committee member	present
Gregg O'Neal	Committee member	present
Michael Schapira	Committee member	present
Jim Serne	Committee member	absent
Richard Swartz, Vice-chair	Committee member	absent
Stanley Tong	Committee member	absent
Ken Jackson	Program Administrator	absent
Ty Garber	Associate member	absent
Shawn Kassner	Associate member	absent
Mike Miller	Associate member	present
William Mills	Associate member	absent
Frank Jarke	Guest	present
Theresa Lowe	Guest	present
William Daystrom	Guest	present

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

Maria asked the committee to confirm receipt of the documents e-mailed April 1, 2011. All confirmed receipt.

2)   Guest Introduction

Maria introduced a guest to today's teleconference: Theresa Lowe. Theresa works with CCI Environmental Consultants, a stack emissions testing company located in Salt Lake City, Utah, and is involved with the Source Evaluation Society. She joined the call to learn more about SSAS and the TNI SSAS Expert Committee.

3)   Review and approve minutes from teleconference on March 21, 2011

Before reviewing the March 21, 2011 minutes, Maria stated that the minutes from the February 28, 2011 meeting were approved by e-mail vote. The committee then reviewed the minutes from the March 21, 2011 meeting. Mike Schapira motioned to accept the minutes, and Gregg seconded. All were in favor of the motion.

Action Item: Since a quorum was not present, Maria will ask the absent members to vote by e-mail.

4)   Update on latest EPA's additional comment (TIA on Section 4.1.3 V1M2)

Maria reported that the Consensus Standards Development Executive Committee (CSDEC) was conducting a vote by e-mail on the TIA for V1M2 Section 4.1.3 that was previously approved by the SSASEC. If the CSDEC approves the TIA, the documents will be forwarded to Candace at EPA for review and hopefully approval.

5)   Update on Audit Sample Calculation Tool

Michael Klein said that the regulators had worked on the Tool by e-mail and had reached a few conclusions: 1) they wanted to keep the Tool as simple as possible; 2) this is a Tool, not a requirement; and 3) stack testers should be able to figure out how to convert from concentrations to lb/hour, so they decided to leave the input in the data entry section of the Tool in lb/hour units only. This is a Tool that is being presented as a courtesy. Maria asked if we can approve the Tool as it is now, so that William can proceed with building out the spreadsheets for the other methods. Michael Klein said that William could build the spreadsheet using the input as it is now. William added that he had enough information to proceed with building the other spreadsheets.

Action Item (1): William will build spreadsheets for the remaining methods, and keep the regulators informed as he makes progress.

Action Item (2): Maria asked Gregg to give his suggestions about some of the equations to Richard. Gregg agreed.

6)   Commence Discussion Regarding the SSAS Table

Maria opened by congratulating and thanking the members of the SSAS Table subcommittee for their hard work and great job in reviewing the SSAS Table.

The committee opened the attachment entitled "SSAS Table - General comments" from Maria's April 1, 2011 e-mail to the committee.

1. Proposal to change SSAS Table title language from "EPA Clean Air Act" to "TNI Clean Air Act"

   Maria said that we cannot rename the title to suggest that the Clean Air Act belongs to TNI. Gregg suggested the alternate title "TNI Performance Audit Samples for the Clean Air Act." He also said that the reason TNI was in the name was to make clear that SSAS Table limits are set by TNI, not by EPA.

   Maria suggested "TNI Stationary Source Audit Sample Program" instead. Mike Miller said that if a title is necessary above the "Stationary Source (SSAS) Table" line, he suggested using "TNI Performance Audit Samples for the Clean Air Act." The full title at the top of the SSAS Table would therefore be:

   TNI Performance Audit Samples for the Clean Air Act
   Stationary Source Audit Sample (SSAS) Table
   Effective Date [insert date here]

   Gregg said he liked it. Maria voiced concern about introducing a new term ("Performance Audit Samples"). She preferred to use the familiar "TNI Stationary Source Audit Sample." Gregg said the reason for saying "Clean Air Act" was to explicitly say that these were air audit samples, not for water or anything else. Michael Klein agreed with Mike Miller's suggestion.

Maria said we would go with Mike Miller's suggestion for the title for now, but the committee will not vote at this time, as we were only brainstorming.

Action Item: Maria will let the absent committee members know by e-mail what the group had discussed.

2. Revision of the TNI SOP 4-101 used by the subcommittee

Maria asked the subcommittee members if they knew what version of the TNI SOP had been used during their review. She was concerned that the version posted on the TNI website (revision 3.1) had not been signed. No one on the call knew the answer to Maria's question.

3. Source of Historical Data used by the subcommittee

Maria reminded the committee that the Final Rule required that only historical data from the audit sample program be used for evaluation of acceptance limits and concentration ranges. Although the initial SSAS Table was created in consultation with EPA using some data that was not from the EPA audit program, once the Final Rule was published, it was required that further evaluation of the SSAS Table use only historical data from the audit sample program. Gregg said that the data used by the subcommittee came from EPA. Maria noted that Shawn had once asked her if she had or could obtain data from laboratories for use where there was limited EPA data available. Mike Schapira said that for Method 26, he believed the only historical audit sample data available was for chloride, and that they did not have EPA data for fluoride and possibly bromide.

Action Item: Mike Schapira will double-check the source of data for Method 26.

4. Origin of Audit Sample Reporting Limits (ASRLs)

Maria said that ASRLs were only briefly mentioned in the subcommittee minutes. She asked if the subcommittee members could add any background information regarding the source and reason for the addition of the ASRL column to the SSAS Table. After a brief discussion about how concentration ranges were derived by looking at historical data, Mike Schapira and Gregg said that neither of them remembered much discussion in the subcommittee about ASRLs. Gregg thought that Jeff Lowry might have added the ASRLs. Mike Miller said the Reporting Limit was the lowest level a laboratory can calibrate to and have a quantitative answer. Furthermore, having reporting limits in the SSAS Table tells laboratories they need to have a calibration range that covers the range in the SSAS Table; otherwise they can't do the work for their client. Maria asked, if she was the lab, why she would need to go lower than the low end of the concentration range: if the concentration range was 50-2000, wouldn't the lab only need to see down to 50? Gregg replied that if the range was 50-2000, and a Provider provided an audit sample with an assigned value of 50, that was a legitimate audit, and if the lab could not see below 50, then just calling it 50 does not mean that you

are able to identify that audit; that was the reason for the low end of the range. He added that the lab should provide information about how low they can go, and if they just report 50, they are taking a wild guess; if they calibrated at 100, and the result is ND, they could just say the result was 50. Gregg thought that the subcommittee saw the lack of ASRLs in the SSAS Table as a fault of the Program, and the ASRLs were added to address that. Mike Schapira agreed.

5. ASRL Footnote

Maria said the last sentence of the proposed ASRL footnote was confusing: "At a minimum for all analytes with an assigned value of less than ASRL (<ASRL), the SSAS Provider should verify that the sample does not contain the analyte at a concentration greater than or equal to the ASRL." She said it sounded redundant since the Provider module of the TNI SSAS Standard already covers verification procedures. At this point Gregg said that he had discovered how the ASRLs were arrived at: the ASRL was based on the low end of the concentration range and the acceptance limits: if the lowest concentration was 50, and the acceptance limit was +/- 20%, the ASRL would be 20% below 50. Maria said that would be good; if the lab could see lower than the concentration range, that would be better. Gregg reiterated that to analyze audit samples, laboratories will need to be able to see at least that low.

Regarding the reason for the last sentence in the ASRL footnote, Gregg said that it might be there because it was possible that there could be some concentrations of residuals below the ASRL in the sample, and that would not be a legitimate audit. Maria offered the example of an audit sample where the assigned value was 50, and the lab detected 42; the lab would report <50. Gregg said that for audit samples, you are supposed to report a number, not a less-than number.

Action Item: Maria said she would ask Shawn if he recollected the reason for the last sentence in the ASRL footnote.

6. Comment regarding Method 7. Michael Klein pointed out that audit samples are not required for Method 7E. Maria added that EPA had posted in a FAQ on their website that there would be no audit samples for Methods 3A, 3C, 6C, 7E, 9, 10, 18, 20, 25A, 303, 318, 320, and 321.

Maria reminded everyone that, as required in the EPA Final Rule, there would only be audit samples if there are at least two Providers selling that particular audit sample. At this time, there are only two Providers; hopefully there will be more once the Program is approved and underway. Until the Program is in place, the Accreditor is not accessing any Providers.

The meeting adjourned at 3:35pm EDT. The next meeting will be April 18th at 2:00 pm EDT.