

TNI Stationary Source Audit Sample Expert Committee Teleconference  
May 8, 2012, 2:00 pm EDT

Attendance:

Maria Friedman – Chair TestAmerica (Laboratory)	Committee member	present
Mike Hayes Linde (Provider)	Committee member	present
Michael Klein New Jersey DEP (State government)	Committee member	present
Theresa Lowe CCI Environmental	Committee member	absent
Paul Meeter Weston Solutions (Stationary Source Tester)	Committee member	present
Gregg O’Neal, North Carolina DAQ (State government)	Committee member	present
Michael Schapira Enthalpy (Laboratory)	Committee member	present
Jim Serne TRC Solutions (Stationary Source Tester)	Committee member	present
Richard Swartz, Vice-chair Missouri DNR (State government)	Committee member	absent
Stanley Tong EPA Region 9 (Federal government)	Committee member	present
Ken Jackson TNI (Program Administrator)	Program Administrator	present
Ty Garber Wibby (Provider)	Associate member	absent
Shawn Kassner ERA (Provider)	Associate member	present
Mike Miller (Member at large)	Associate member	absent
William Mills Mills Consulting (NELAC Assessor)	Associate member	absent
William Daystrom TNI (Webmaster)	Guest	present
Charles Simon	Guest	present
Frank Jarke	Guest	present

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

All present confirmed receipt of the documents e-mailed May 4, 2012.

- 2) Review and approve minutes from the teleconference on April 23, 2012.

It was moved by Mike Schapira and seconded by Michael Klein to approve the minutes. Approval was unanimous. It was noted that the minutes of April 9 had also been approved by e-mail vote (6 in favor and 2 abstentions).

3) Chair update

Maria reported that Liquid Technologies remains interested in being a provider for method 25 audit samples. They had asked if they could be approved by default since they are already approved by EPA. However, the standard requires providers to have TNI approval.

Maria also reported that she is waiting for a decision from EPA on the question of whether the use of default limits for new audit samples, as previously proposed in the draft TNI SSAS Table Management SOP, would be acceptable.

4) Review Method 25 Acceptance Criteria and Concentration Range Proposal from SSAS Table Subcommittee

Shawn reported that a statistical analysis of the data provided by Charles and Wayne showed it matched the historical data closely. A blank subtraction gave a better fit. Maria asked why a blank subtraction would be needed if not below 150 ppmC (150-2500 ppmC is the range). Shawn replied that is just a recommendation to EPA, since it has an effect below 150 ppmC. The EPA historical data do not show a blank correction is needed. Shawn said the EPA historical data did not have carbon dioxide added, and Charles added that carbon dioxide did not interfere with the GC analysis. It is organic contamination that interferes, and blank correction would tighten up the regression equation. The historical data also showed field errors, but that was not taken into account in his laboratory work. Maria asked if it could be a TNI recommendation for each state regulatory agency to decide if it wants to allow a blank subtraction. However, it was remarked that it would not be a good idea to allow that flexibility, and there is nothing in the method saying how to run a blank.

Wayne said method 25 is different from other methods that just send a sample to the laboratory. Method 25 involves field activities and most of the errors are introduced in the collection phase rather than the laboratory measurement. Since there are no sampling details in the method, the Expert Committee will write a guideline for collection. Maria noted that this task was started by the Committee last year and that it had been put on hold while other method 25 issues were worked out. Charles said he would send committee members a copy of the guidance document that he had developed for method 25 sampling.

Charles suggested both carbon monoxide and methane should be added as tracer gases, so the laboratory will know if a good sample was collected, and not just ambient air. It was decided the subcommittee's concentration range and acceptance criteria proposal will be adopted, noting that the TNI SSAS Standard allows them to be modified as time goes by. There was a question whether a state could require tighter limits than EPA. Michael Klein said he doubts it, but he will check back with NJ. The Committee will recommend to EPA improvements to method 25, such as method blank subtraction, criteria for sample collection, and addition of tracer gases like methane and carbon monoxide to the audit sample. Stan suggested first asking if EPA will be open to hearing the Committee's recommendations instead of going straight to the recommendations. Maria will do so as Stan suggested and if affirmative response is received, the committee will write the recommendation and all will have the opportunity to comment. Another subcommittee may also be formed to formulate the actual recommendations.

It was moved by Greg and seconded by Jim to adopt the following concentration range and acceptance criteria for method 25:

Concentration range 150 – 2500 ppmC;

Acceptance limits set at the mean  $\pm$  2 SD, where Mean =  $a \cdot T + b$ , and SD =  $c \cdot T + d$  where T is the assigned value.

In favor were Jim, Mike Hayes, Mike Schapira, Paul, and Greg. Maria was opposed and Michael Klein was adamantly opposed. The remaining Committee members will be asked to vote by e-mail.

#### 5) Adjournment

The meeting was adjourned at 3:20 pm EDT.

The next meeting is scheduled for May 21, 2012, at 2:00 pm EDT

TNI Stationary Source Audit Sample Expert Committee Teleconference Agenda for May 8, 2012:

- 1) Double-check receipt of documents to be referenced in this teleconference
- 2) Review and approve minutes from teleconference on April 23, 2012
- 3) Chair update
- 4) Review Method 25 Acceptance Criteria and Concentration Range Proposal from SSAS Table Subcommittee