TNI Stationary Source Audit Sample Expert Committee Teleconference
June 17, 2011

Attendance:

Maria Friedman – Chair TestAmerica (Laboratory)	Committee member	present
Mike Hayes Linde (Provider)	Committee member	absent
Michael Klein New Jersey DEP (State government)	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	present
Stanley Tong EPA Region 9 (Federal government)	Committee member	present

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

Maria asked the committee to confirm receipt of the e-mail sent on June 17, 2011. All confirmed receipt.

2) Continue discussions re. Method 25

Maria announced the goal of completing Method 25 deliberations today, using the five-point motion from Michael Klein as the basis for the discussion. Maria informed the Committee that according to Roberts Rules, the motion on the floor could be amended if everyone in the voting Committee approved those changes.

Point 1

Jim said that Method 25 has limitations and may not be very precise at low concentrations. Testers blame Laboratories for this; Laboratories blame testers. Jim prefers a dual (field and lab) audit for the low concentration, and a third field-only audit at the high concentration. To avoid contamination, the Testers would need to know which of the audit samples they received in the field was low versus high concentration.

Richard, Michael Schapira, and Maria agreed with the dual audit suggestion. Gregg agreed but had a question about whether the high audit was really necessary if the low concentrations were the main concern. Jim said that was how it was always done, but thinks it would be useful to continue.

Gregg wanted to make sure that either Laboratory or Tester could request a dual audit at the high concentration if they wanted. Jim agreed this should be an option, though he didn't think it would be needed.

Maria asked Michael Klein and Richard to continue to put together sample collection guidelines that would cover the details such as the equipment and sample train that must be used.

Motion and Vote
Mike Schapira moved that Michael Klein's motion be amended so that the dual audit would be required for the outlet (low concentration), and optional at the inlet (high concentration). Field audit samples would be labeled by the Provider to indicate low or high concentration. Richard seconded, and all present voted in favor.

Point 2
The Committee discussed whether it was important that, with a dual audit, the Laboratories analyze the field audit before they analyze the lab audit. This led to discussion of whether the field and lab audits needed to be the same concentration. The consensus was that it would be better if it was not prescribed, one way or the other, that the concentrations be the same or different. That way, concentrations could be random and the Laboratory would not be able to know for sure whether the field audit sample would necessarily be the same concentration as the lab audit sample.

Motion and Vote
Richard moved to remove Point 2 from the motion. Gregg seconded. The members in attendance were polled:

Stan: agree
Michael Schapira: agree
Michael Klein: not sure
Maria: agree
Jim: agree

Point 3
The Committee discussed whether the concentration range proposed in Point 3 (50-2500 ppmC) was appropriate. Even though Regulators could request concentrations outside of the range in the SSAS Table, the consensus was that the SSAS Table should define the low end of the range as 50 ppmC and the upper end of the range as 2500 ppmC.

Motion and Vote
Richard moved that Point 3 of Michael Klein's motion be affirmed, setting the concentration range for Method 25 to 50-2500 ppmC. Michael Klein seconded, and all present voted in favor.

Point 4
All agreed to discuss Point 5 prior to Point 4.

Point 5
The poor performance of the method at low concentrations was discussed. Michael Schapira expressed concern that the background contamination reported by Wayne and Charles at 7-10 ppmC, even with clean equipment, would represent a large percentage of the assigned concentration for 50 ppmC audits. Michael Klein pointed out that if the acceptance limits were wide and the Laboratory received an acceptable evaluation from the Provider, even if he considered the performance to be poor, it would be difficult for

him to convince anyone of that fact in the face of an acceptable evaluation. Gregg thought that Testers and Laboratories would want to keep improving, even if they received acceptable evaluations with poor results at wide limits. Richard suggested that the Committee could decide to not have audits below 300 ppmC and to tell EPA of that decision, with the hope that EPA would take notice and make changes for the method. Gregg recalled a conversation with Gary McAlister whereby Gary told him they did not want to send audits below 100 ppmC.

Maria reminded everyone that the TNI SSAS Standard leaves ultimate acceptance of results up to the Regulator. Michael Klein said he preferred having tighter criteria, and Regulators could choose to accept audits that failed. Jim argued the opposite point of view and was concerned about Regulators who wouldn't go any further than accepting the Provider evaluation.

Jim said that the EPA rule required that we use historical data to set the acceptance criteria. He was concerned that we had to follow that requirement in order to be legally defensible. Hopefully in two years, data would justify tightening criteria. Gregg agreed that criteria could be re-evaluated later as data was collected.

Maria said that the 90% criteria requirement did not specify that it be met for any particular concentration range, and that 90% overall could meet the rule.

The Committee debated a suggestion from Jim to set criteria as +/- 40%. Maria suggested using a footnote to reiterate that Regulators had ultimate authority to accept or reject results. Jim added an idea that there could be acceptance criteria only down to 150 ppmC, while audit samples from 50-150 ppmC would not have defined acceptance criteria. For audits below 150 ppmC, Providers would report no evaluation (neither 'acceptable' nor 'not acceptable'). Gregg supported the idea, and said he wanted to use the regression equation because bringing historical analysis into the process was good. Jim agreed regarding using the regression equation. Richard said that if the acceptance limits were too wide, the audits would be meaningless; Michael Klein agreed with Richard, and said if Method 25 audits were meaningless, he would abandon that method and just use Method 25A. Michael Klein added that Method 25A tends to bias destruction efficiency results high.

The Committee decided to continue discussion on this point at the next meeting.

3) Adjournment

The meeting was adjourned 3:05 pm EDT.

The next meeting is scheduled for June 20, 12:00 - 1:30 pm EDT.