

TNI Stationary Source Audit Sample Expert Committee Teleconference
June 27, 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	absent
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	present
William Mills Mills Consulting (NELAC Assessor)	Associate member	absent
William Daystrom TNI (Webmaster)	Guest	present
Jeff Lowry ERA (Provider)	Guest	present
Paul Meeter	Guest	present
Theresa Lowe	Guest	present

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

All present confirmed receipt of the documents e-mailed June 24, 2011.

- 2) Review and approve minutes from teleconference on June 13, 2011

The following corrections were proposed:

under the list of corrections, it should state that methods 25A and 18 *do not* have blanks;
correct Gregg’s name in two places where it is misspelled.

Gregg moved for approval of the minutes as amended, and Richard seconded the motion. All members present voted in favor.

3) Chair Update

- a. Maria reported that the voting members had met by teleconference on June 17 and 20 to discuss a motion presented by Michael Klein; i.e.,

Method 25 audits shall be defined as follows:

1. For each sampling location (e.g., inlet and outlet), two audit samples (or cylinders) will be provided; one audit sample shall be collected in the field and then analyzed, and the second audit sample shall be analyzed without field collection.
2. Audit samples that are collected in the field shall be analyzed prior to audit samples that were not collected in the field.
3. Audit concentrations shall be 50 - 2500 ppmC.
4. The diluent gas for the audit sample shall include CO, CH₄, and CO₂.
5. Acceptance criteria shall be +/- 30% for audit samples collected in the field, and +/- 20% for audit samples not collected in the field.

The outcome of those teleconferences was as follows:

1. Dual audits (field and lab) should be required for outlet, and it should be optional for inlet.
2. Delete; no need to specify what order to analyze dual audits.
3. Concentration range = 50 to 2500 ppmC.
4. Delete; interferents should not be added at this time.
5. For field audits, use a regression equation but cap the acceptance criteria at max +/-40% and min +/-30, plus add footnote. For laboratory audits, acceptance criteria at +/-20% for all the concentration range.

Note that Point 5 is still pending for pre-approval. Jim was tasked to ask Laboratories (i.e., Wayne and Charles) whether the laboratory audit criteria can be met. (See item 4 below for continued discussion).

b. Maria had contacted potential audit sample provider accreditors. She had not heard back from A2LA. Shawn reported that his provider company had been contacted earlier by A2LA, but there had been no follow-up on scheduling an audit. Maria thought it would be about 6 months before approved SSAS providers will be available. Maria has invited ACLASS and A2LA in future calls, and received a positive response from ACLASS who would like to provide at least two representatives.

c. Maria reported she received an e-mail (which she also read to all during the call) from Candace where Candace reiterated the Final Rule requirement regarding gaseous samples, and that EPA will not list in the EMC website any audit samples that do not meet the Final Rule requirements.

d. Maria has submitted to the TNI Board for approval of Theresa as a Committee Member. Paul Meeter's application is still pending. He reported that he had submitted all his paperwork some time ago, including his TNI membership fee on May 17. Maria will follow up with TNI.

4) Continue discussions re. SSAS Table

Jim reported he had asked two laboratories that use method 25 if they could meet the +/- 20% acceptance criterion at 50 ppmC, or if not whether they could meet it at 100 or 150 ppmC. One laboratory said not at 50 ppmC, because they are not permitted to correct for the big blank error (about 10.5 ppmC). The laboratory believed they could meet the criterion at 100 and 150 ppmC. However, the laboratory might not be able to meet the criterion if the methane and carbon dioxide interferences are present. Jim added that the laboratory should be provided with both a trap fraction and a tank fraction. Maria reported that EPA says the audit must include the field-collected sample; i.e., it must also test the sampling system. Jim agreed, saying method 25 requires analysis of two fractions that are analyzed in two different ways, so the audit sample must provide this. Maria questioned whether regulators will be able to require the laboratories to meet the expense of both audit samples. Jim suggested the provider should send a tank sample and a trap sample as a vial that the laboratory spikes onto its trap. Jeff said it might not be feasible to make the trap sample stable. It was suggested the laboratory may have to extract from a cylinder onto the trap. Theresa asked if the laboratory could be provided with a spiked resin, but Jeff responded there is no resin; just a tube containing glass wool and kept on dry ice. There was now some question whether the sample is stable when maintained on dry ice; i.e., whether the method really works.

Maria asked if Providers can help resolve the questions regarding the stability of the trap fraction of the lab audit, whether the +/-20% acceptance for both trap and tank fraction results (added together) are doable at Laboratory, and whether Providers can meet their own requirements in making the lab audits. Jeff asked that a formal task be assigned to the subcommittee.

Action Item – Maria will send an e-mail tasking the subcommittee.

5) Adjournment

The meeting was adjourned at 2:55 pm EDT.

The next meeting is scheduled for July 11, 2:00 - 3:30 pm EDT.

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for June 27, 2011:

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- 2) Review and approve minutes from teleconference on June 13, 2011
- 3) Chair Update
- 4) Continue discussions re. SSAS Table