TNI Stationary Source Audit Sample Expert Committee Teleconference Meeting
October 8, 2013, 1400 hrs. EDT- final C.G. Simon

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	absent
Theresa Lowe CCI Environmental (Stationary Source Tester)	Committee member	absent
Paul Meeter Weston Solutions (Stationary Source Tester)	Committee member	absent
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**
Stanley Tong EPA Region 9 (Federal Government)	Committee member	absent
Tom Widera ERA (Provider)	Committee member	**Present**
Bob O'Brien Sigma-Aldrich (Accredited Provider)	Committee member	**Present**
Mike Miller (member at large)	Associate member	absent
William Daystrom TNI (Webmaster)	Guest	**Present**
Charles Simon, VOC Reporting, Inc. (Laboratory)	Guest	**Present**
Katie Strickland Element One (Laboratory)	Guest	**Present**

The meeting was called to order at 1403 hours EDT by the chair, Maria Friedman. There was a quorum present.

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

All present confirmed receipt of the documents (TNI SSASEC Teleconference Agenda for 10-8-2013.doc TNI_SSASEC_Mtg_9-23-2013_draftv2.doc SSAS Table Rev. 4_Effective 10-8-2013.pdf TNI SSAS WDS V1M1-Rev0.2 (Provider).pdf).

[2] Review and approve minutes from teleconference on September 23, 2013.

The minutes were reviewed. Jim Serne moved to accept the minutes and Tom Widera seconded the motion. A vote resulted in passage of the minutes from the 9/23/13 meeting. Charles Simon will send the final version to William Daystrom for posting on the website.

Maria reported that Bob O'Brien is now a voting member, and Charles has applied for membership. Maria also asked Katie Strickland to join and received a positive response. Maria will help Katie with the links to the application process.

[3] SSAS Central Database update

William reported the following updated statistics for the database so far:

- 418 reported audit sample results, up from 394 (The individual results were contained in a total of 131 audit report uploads, up from 107.),
- 81 Regulator IDs issued, up from 75,
- 99 Stationary Source Tester IDs issued, up from 87,
- 52 Laboratory IDs issued, up from 48.

William reported the following pass/fail statistics for Method audits that had at least one failure:

Method	Analytes	Pass	Fail
6	SO2	13	2
8	SO2/SO3	0	1
13B	fluorides	11	4
26A	HF	8	1
29	Ni (filters)	11	2

All other audit types had zero or one failure out of >15 samples.

The error reported last week for Hg was removed from the data set. William will email a spreadsheet of results to the committee members but asked that they not distribute it. Charles pointed out that the summary information just reported will be in the minutes.

[4] Review and approve SSAS Table Update, Revision 4

The updated SSAS Table (Revision 4) dated 10-8-13 has only one change, which is footnote 18:

"[18] Not all methods and analytes listed in this Table may be commercially available and required for audit sample analysis; consult the **List of Required Audit Samples**, published on the EPA's website at http://www.epa.gov/ttnemc01/email.html, and the applicable Regulatory Agency, for information regarding audit sample availability and requirements."

Every one present agreed with the language and Jim motioned to accept the change. Gregg O'Neal seconded the motion. The motion passed unanimously. Revision 4 of the Table will be posted on the website.

[5] Discuss TNI SSAS Standard, Volume 1, Module 1

Concerning 8.3.f, Tom asked if a unique identification number makes each audit sample different even though they may have come from the same batch. Providers have interpreted 8.3.f to mean the samples from the same batch.

Tom suggests that a maximum of 8 samples from the same batch be sent to the same lab in 12 months. This would keep the costs down. Record keeping will keep the limits enforced. Gregg asked if all the audit samples are in a low range, will this assure randomness. Tom answered yes; there will be batches throughout the range. If acceptance limits are ±10% and there is an "8" and a "10", the lab would not benefit from guessing.

There was some discussion of making individual dilutions of a concentrate, but the current program rules would require analysis of each dilution. Tom says the best idea is to have multiple batches that cover a concentration range. The closeness of reported results helps determine the best lab performances. Bob O'Brien reported that Sigma-Aldrich takes the same approach and has multiple batches that cover a range.

Maria asked for additional comments. Gregg asked if the limit of 8 samples from each batch in 12 months was enough. Tom answered that 8 limits replication as shown in the past EPA audit program, but unlike that program where the exact results were never disclosed, the new SSAS program reveals exact concentrations to the concerned parties.

How frequently are batches changed? Tom said there are ~25 samples in a batch and 3-4 batches cover a range. So they should sell out of each batch in 6-7 months. Sometimes they make specific concentrations for Regulators and this adds to the number of batches and the randomness.

Maria suggested that perhaps we need specific language. How many batches around each range? Charles suggested seven batches with >±10% difference. Others agreed that 4 batches are enough. Maria agrees that 4 should be enough. Tom and Bob said that in practice they have more than 4 batches around each concentration range. Jim said that we can always check the complete analytical data to evaluate Laboratory performance.

A question was asked, what should be done to cover a concentration range of 100x? Charles answered that EPA already has regulations regarding instrument calibration that covers this, zero, 20%, 40% and 80% of the 100x range. We could extend this for the SSAS program to 1%, 10%, 20%, 40% and 80% to assure coverage of a 100x concentration range. We would need 4 batches at each range with >±10% difference.

William suggested that maybe the true values should only go the Regulators. Maria said this debate has already been done. The aim of the Program is to improve Laboratory performance. We need specific language to change the Regulation. We already have rules and procedures for changing the Table, for example adding a lower concentration range. Charles pointed out that the procedures require submission of all supporting data.

Jim said we should limit the number of samples from a batch that are sent to the same lab to ≤8 in 12 months, and we should define the number of batches around each range to ≥4. Maria will draft the wording for a TIA and request comments. Jim asked if an Accreditor could cover this issue in a batch definition, for example A2LA could provide a definition. Maria said that a lot is defined in 8.3 and we could expand on this. Charles asked that if we define the number of batches around each range, should we also define the difference of the concentrations among the batches, like >±10%? And is the limit of 8 samples from each batch sent to the same lab in 12 months enough? Tom answered yes, this will assure randomness. Bob said we already have enough safeguards in place and the regulations are making things too complicated. We want the audit sample concentrations to be mixed and unpredictable. Jim said we should be able to look at the database and see if this is happening.

Charles agreed that we should have specific language and suggested that it be based on the Providers SOPs. Maria reminded all that Bob had already said "no" to more restrictive regulations. Tom said that there is integrity in the Labs and that the risk is too great for analysts. Maria said she will put the 8X language in a TIA and distribute for comments by email. She will write the changes to 8.3.f and in the TIA.

On one other topic, Maria reported that Foston Curtis from EPA Office of Air Quality Planning and Standards (OAQPS) asked if we wanted Method 25Z to be submitted as an update to Method 25 for inclusion in the next round of reviews this Fall, or if we wanted to submit it to Ray Merrill as an Alternate Method for a specific source. Charles said that we should do both since the data for ***asphalt dryer sources*** is included with the submittal as Alternate Method 25Z. As an update to Method 25, M25Z includes all of the improvements the committee deemed important as well as codified procedural language in support of the SSAS program, i.e., procedures for collecting and reporting audit samples and blanks. Charles will send Maria a "cleaned" version of M25Z for submittal to Foston as an update for Method 25. We should notify Foston that the current submittal should be sent to Dr. Merrill as an Alternate Method for Asphalt product dryers.

The next TNI-SSAS committee teleconference will be on October 21, 2013 at 1400 EDT. The meeting was adjourned by the Chair at 1522 hours EDT.