

TNI Stationary Source Audit Sample Expert Committee (SSAS) Meeting Summary

October 7, 2019

1. Roll call and approval of minutes:

Chair, Tom Widera, called the TNI SSAS Executive Committee meeting to order by teleconference on October 7, 2019, at 2pm Eastern. Attendance is recorded in Attachment A – there were 4 committee members present. Associates - Eugene Chen and Stan Tong (until 3pm Eastern).

The minutes will be reviewed and approved by email.

2. Letter to the TNI Board of Directors and CSDP EC

The Committee worked on a DRAFT letter to explain why the SSAS program should continue. They started by brainstorming a list of things to include in the letter.

- The cost of operating the SSAS expert committee is small (estimated to be <1% of the total TNI budget).
- The SSAS Expert Committee is currently revising the SSAS Modules to reflect the current SSAS Audit Sample process and not the PT process.
- The update of the Modules will make the program more cost effective for a Provider, with the goal that it will encourage a second Provider to become accredited. This would allow the program to resume.
- The SSAS Expert Committee is also creating SOPs for conducting a pilot study expanding the SSAS table concentration ranges and add analytes and also for managing the SSAS table. (The expansion of the tables is being requested by the Regulatory Agencies and also other participants of the program.)
- Although the Audit Sample program is now voluntary, Audit samples are still being requested and analyzed. The volume of Audit Samples being ordered has decreased. But with audit samples being reported, the quality of the data can still be monitored by the Expert Committee.
- The SSAS Committee is responsible for maintaining the SSAS Central Database.
- A Voluntary Consensus body is required in the CFR to be in charge of the Audit program. The SSAS Committee meets the EPA requirements for this body. Without the Committee, there will no longer be audit samples.
- The SSAS Expert Committee oversight of the program is mentioned specifically in the SSAS Modules and with no Committee there can be no SSAS program. (Site specific sections in the modules.)

- The completion of the SOPs and revision of the modules will allow the program to immediately resume operations within 60 days with the accreditation of a second provider.
- Sheri emphasized that Standard development is not a fast process. This would be a good thing to point out as support for why the work in progress should be finished. Time consuming to restart.
- Once the modules are completed, they need to be reviewed and voted on by the Expert Committee and then sent out for a VDS.
- The experience of the committee is allowing the committee to effectively update the Modules to best reflect the needs of the SSAS Program participants.

Sheri will take the notes from today and prepare a DRAFT letter for people to review and comment on by email.

3. Federal Register Comments

Sheri sent a copy of the results from the survey and asked if the committee wants to add some comments. The Committee does. Ilona noted that this type of correspondence needs to be coordinated through Jerry Parr.

Sheri is not sure that EPA has the option to change the requirement to whether the samples are available instead of needing two providers. They want to be sure there is competition in the market to keep prices reasonable. Is there an alternate means to keep prices competitive so that there is no monopoly or price gouging.

Tom asked if there is any value to asking them to ask to allow one provider and there be caps on pricing. Sheri thought that there is something in EPA's requirement that allows putting caps on pricing where it might be based on a certain profit margin.

Ilona noted that any comments on pricing would have to come from Audit Sample providers. It may not be appropriate for pricing comments to come from the committee.

ERA is meeting next week to submit their comments to EPA.

The administration of an audit sample takes more effort than what happens with a round robin PT sample.

Tom asked for ideas of what to include in the letter:

- Ask for alternate consideration for the definition of commercially available.
- Check for changes in the P/F rate from the central database over time to determine if the program has resulted in an increase in the quality of the results.

- The Audit sample program is small yet highly specialized program, unlike the current PT accreditation programs. Due to the finite market share and smaller demand than for the PT program, redefining the “commercially available” to possibly encompass just one accredited provider would be an appropriate reason for proposing an alternate consideration for the definition of commercially available.
- Exempting SSAS from the two accredited provider requirement.
- The smaller market for these samples may be preventing multiple providers from participating as well as creating a situation where an excess of inventory is required to be kept by providers based on the current requirements in the SSAS modules.
- Lowering the concentration range for several methods/analytes would provide audit samples that are more in line with the concentrations found in the field samples and provide a better representation of the data being submitted. The SSAS Expert Committee is currently working on a procedure to lower the concentration ranges.

The Committee will continue to work on the letter. It is not due until December.

4. New Business.

- None.

5. Action Items

The action items can be found in Attachment B.

6. Next Meeting

The next meeting will be October 21, 2019 at 2pm Eastern. Ilona will send out a Webex invitation the day of the meeting. (Addition: The 10/21/19 meeting was canceled. The next meeting was November 13, 2019.)

Action Items are included in Attachment B and Attachment C includes a listing of reminders.

Tom adjourned the meeting at 4pm Eastern.

Attachment A

Participants

TNI

Stationary Source Audit Sample Expert Committee

Members	Rep	Affiliation	Contact Information
Tom Widera (2020) CHAIR Present	Other	ERA (Provider)	twidera@eraqc.com
Ilona Taunton, Program Administrator Present/Recording		TNI	Ilona.taunton@nelac-institute.org
Ed MacKinnon (2022) Absent	Other	TRC Env Corp (Stationary Source Tester)	emackinnon@trcsolutions.com
Gregg O'Neal (2020*) Absent	AB	NC DAQ	gregg.oneal@ncmail.net
Katie Gattis (2020) Absent	Lab	Element One Inc.	katie.strickland@e1lab.com
Michael Klein (2020*) Present	AB	NJ DEP	michael.klein@dep.nj.gov
Michael Schapira (2021*) Present	Lab	Enthalpy Analytical LLC	Mike.schapira@enthalpy.com
Sheri Heldstab (2022*) Present	Lab	Chester LabNet	sheldstab@chesterlab.net

Attachment B

Action Items – Stationary Source Audit Sample Expert Committee

	Action Item	Who	Date Added	Expected Completion	Completion
2	Find out which group in EPA is helping the Microbiology FoPT Subcommittee crunch numbers for limits.	Ilona	2/12/18	3/19/18	Need to hear back from Jennifer Best.
9	Prepare general summary of what the committee plans to change in the current Standard and why. First DRAFT.	Tom	4/23/18	5/21/18	In progress.
10	Send ideas on Storage Condition issue to Tom so he can summarize them for an agenda item in July.	All	6/18/18	7/15/18	
15	Provide Ilona with notes from New Orleans meeting so August minutes can be completed.	Tom	10/15/18	TBD	
18	Update SOP 6-100 based on review during meeting.	Tom	1/22/19	2/24/19	In Progress
22	Provide list of states that offer accreditation in Air.	Tom	7/22/19	8/6/19	In Progress
23	Contact Advocacy to see if they have a list of states with air accreditation.	Ilona	8/6/19	8/19/19	
24	Prepare DRAFT letter to send to the TNI Board regarding need for continued SSAS activity.	Tom	8/6/19	8/19/19	
25	Get CRA form posted on the TNI website.	Tom/ Ilona	8/6/19	8/19/19	

	Action Item	Who	Date Added	Expected Completion	Completion
26	Look for older tables that were used to calculate the original limits	Tom	8/26/19	TBD	
27	Check with Jerry about changing the title of the SSAS table.	Ilona	9/9/19	9/23/19	Complete
28	Prepare DRAFT letter to the Board and CSDP EC. Send for email comment.	Sheri	10/7/19	10/14/19	

Attachment C

**Backburner / Reminders – Stationary Source Audit Sample
Expert Committee**

	Item	Meeting Reference	Comments