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

November 13, 2019

1. Roll call and approval of minutes:

   Chair, Tom Widera, called the TNI SSAS Executive Committee meeting to order by teleconference on November 13, 2019, at 2:30pm Eastern. Attendance is recorded in Attachment A – there were 5 committee members present. Associate(s): Mike May. Guest(s): Stan Tong.

2. Membership

   Katie and Tom will be rotating off the committee, so the Committee will be at the minimum of 5 members.

   Katie and Tom will continue as associates. Tom asked Committee members to start thinking about a Chair and Vice-Chair for the Committee. Sheri is willing to step in as Chair.

3. Letter to EPA

   Tom reviewed the list of things to include in the letter that was discussed during the last meeting. Comments are due to EPA by December 10, 2019.

   Sheri will draft a letter and send it to the committee for review and comment. She will also copy Jerry Parr for comment.

   List from last meeting:
   - *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 RA 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.*

Stan asked if SSAS could ask for an alternative definition for "commercially available" which currently means two or more independent Audit Sample Providers and propose some ideas. He said the CFR's intent of having at least two independent Providers is to avoid having only a single Provider thereby creating a monopoly. Perhaps adding something about a provider not raising prices if a second provider pulls out might help. Tom noted that ERA has discussed some pricing restraints to price increases if they were the only provider. They would be willing to have a cap placed on pricing increases. This is something ERA will offer.

Needs to say commercially available so labs won't try to make it themselves. Also requires more than one provider per 40 CFR 60.8(g)(1).

The definition of commercially available is the stumbling block. Is there a way to argue that one provider could still mean commercially available? Change it to “at least one” instead of “two or more”. You would need to tie in language to show how pricing could be controlled even with one provider. The government would not want to appear to control a company’s pricing structure.

Sigma said they are not taking any new orders. This means they no longer have samples for sale. Tom will send an update for the TNI website that makes it clear that there is currently only one provider.

Providers can only be accredited for what is available on the SSAS table. ERA looked into making Dioxin and Furan samples, but it was too costly for them to do it. Something can be on the table and it still might not be available as a compliance audit sample because it is not economically feasible for a provider to provide it.

It would be inappropriate for the SSAS Committee to make financial comments. The SSAS Committee needs to represent all views, not just the Provider view. Their decisions need to be for the betterment of the program and not for any specific stakeholder in the program.

The way the program is currently set-up there is a lot of manual work that has to be done to meet the requirements of the current Standard. There is a lot of paperwork that needs to be carefully handled.

EPA really needs to see a need for the program to make them want to consider an alternative definition so the program can continue now.

It was asked if it should be suggested that EPA consider bringing it back in house and contract a provider to make the samples if a second commercial supplier does not step up? Tom noted that they don’t have the resources and it would take some time to set something like this up.

It was asked if the letter should point out why the samples are necessary. Sheri noted they don’t QA the test method as a whole, only the analytical work performed in the lab. It might be better to point out how they make the data more defensible. It is a real time assurance instead of a snapshot in time like a PT sample is.

Tom noted that there is often a lot more QC in the non-air methods in the lab. This is also why the audit samples are important.

Sheri noted that there is a limit on the length of the comments. Tom sent her the link that Ned Shappley sent for comments.

4. SOP 6-100

Tom asked if Ilona has heard anything from Shawn or Carl on the calculations. She has not, but knows that Eric Smith (Chair, PT Program SOP Subcommittee) will also be looking for the same information. Shawn will be spending more time working with the PTPEC, so it may make sense to give him a call directly. Sheri noted that she also prepared a cheat sheet for inclusion in the SOP that may help with some of this:

Appendix A

Example Microsoft Excel Formulae for Statistical Calculations*		
Abbreviation	Description	Microsoft Excel formula
AV	Assigned Value	--
a	Slope of PM vs AV	=slope(SeriesA_cell1:SeriesA_cellN,SeriesB_cell1:SeriesB_cellN)
b	Intercept of PM vs AV	=intercept(SeriesA_cell1:SeriesA_cellN,SeriesB_cell1:Series_BcellN)
c	Slope of AV vs SD	=slope(SeriesA_cell1:SeriesA_cellN,SeriesB_cell1:SeriesB_cellN)
d	Intercept of AV vs SD	=intercept(SeriesA_cell1:SeriesA_cellN,SeriesB_cell1:SeriesB_cellN)
PM†	Participant Mean	=average(cell1:cellN)
SD	Standard Deviation	=stdev(cell1:cellN)
RSD	Relative Standard Deviation	=((average(cell1:cellN))/(stdev(cell1:cellN)))

R^2	Correlation Coefficient squared	=(correl(SeriesA_cell1:SeriesA_cellN,SeriesB_cell1:SeriesB_cellN))^2

†May refer to mean of data set prior to removal of outliers ("robust mean") or after removal of outliers.
Note: "cellN" refers to the final cell in the data series.
** This is not an endorsement of Microsoft Excel. Other programs may be used for the statistical calculation protocol detailed in Section 5.6.*

There was agreement to add it to the SOP as an Appendix.

Format changes were made to Section 5.6.4.

Tom continued the review in Section 7:

- Tom noted that ERA does a Grubb's test to look for outliers.
- The 33% shows up in the PT version of this SOP too.
- You have to have enough data that when any data is thrown out … there is still 20 samples.
- In Section 7.2, the following text was removed: The criteria in sections "Remove erroneous data," n<10, and "Test For Fixed Limits." Note to consider the contingency of a small number of data sets.
- Leave the rest of Section 7.2 in place.
- Sheri commented on LOQs. She does not do organics, but to the best of her knowledge there is no air method that has an LOQ in the method. TNI requires them. It was commented that some of the methods have a calibration range. The lowest level standard is set to the LOQ. Tom noted that in Section 7.3 you need to make sure the method is sensitive enough for the reporting limit. The reporting limit is set by 2 standard deviations. Tom doesn't think the statement applies because they don't have multiple methods available. Gregg does think it is applicable because EPA does make method allowances. This discussion on Section 7.3 will be continued on Monday the 18th.

5. New Business.

- None.

6. Action Items

The action items can be found in Attachment B.

7. Next Meeting

The next meeting will be November 18, 2019 at 2:00pm Eastern. Ilona will send out a Webex invitation the day of the meeting.

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

Tom adjourned the meeting at 3:36pm 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* **Present**	AB	NC DAQ	gregg.oneal@ncdenr.gov
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

	Action Item	Who	Date Added	Expected Completion	Completion
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	
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	
29	DRAFT letter to EPA regarding SSAS program. Distribute to Committee (and Jerry Parr) for comment.	Sheri	11/13/19	11/15/19	

	Action Item	Who	Date Added	Expected Completion	Completion

Attachment C

Backburner / Reminders
Stationary Source Audit Sample Expert Committee

	Item	Meeting Reference	Comments