

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

**December 2, 2019**

1. Roll call and approval of minutes:

Chair, Tom Widera, called the TNI SSAS Executive Committee meeting to order by teleconference on December 2, 2019, at 2:30pm Eastern. Attendance is recorded in Attachment A – there were 6 committee members present. Associate(s): Bill Guyton.

2. Final DRAFT Letter to EPA

The Committee reviewed the Final DRAFT letter prepared by Sheri. The Committee updated the letter and produced a Final DRAFT for review in Attachment D. Tom will email it to everyone today and asked everyone to review it and get back to him before the end of the week with any comments.

3. SOP 6-100

Tom will do a final clean-up of this SOP and send it out for final comments this week.

The group finished with the section on providing results. Sheri noted that the provider needs to report the range of detection limits and LOQs. This needs to be added to Section 6.2. Need to be sure it is clear that these ranges are based only on the data that is used and don't include data that was unusable.

The expectation is that the Provider will provide all the data received and the data that was accepted for calculating the limits. The Committee wants to know about the data that wasn't used. If a lot of data was not used, does it mean the sample concentration was too low?

It was suggested that something like "Other equivalent formulas can be used if a different program is used" be added to the table.

4. SOP 6-101

Tom pulled up SOP 6-101 on WebEx. The Committee began reviewing the SOP for changes starting at the beginning of the SOP. Changes made included:

- Added Section 5.2.2.12: The matrix for SSAS audit samples (“Air & Emissions”) shall not change. (This was moved from the note in 5.3.3 and changed to “shall”. Notes are not enforceable.)
- Section 5.3.2: For expansion of the concentration range **and/or acceptance limits** for an existing method and analyte, refer to TNI SOP 6-100.
- Section 5.3.3: Remove question. Change will to may. Add “a” before SSAS Table Subcommittee instead of “the” since there isn’t currently a Subcommittee.
- Section 5.3.5: Changing NELAC Analyte code. **The SSAS Expert Committee will review the validity of the change request with LAMS and update accordingly.** (Any analyte change has to be valid in LAMS. Tom will add LAMS as a definition above.)
- Delete “Changing of analyte concentration or acceptance limits”, question and “For changing concentration ranges, refer to TNI SOP 6-100”. Some duplication.

The committee finished at Section 5.3.7 and will start there again at the next meeting.

## 5. New Business.

- None.

## 6. Action Items

The action items can be found in Attachment B.

## 7. Next Meeting

The next meeting will be December 16, 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 3:22pm Eastern.

## Attachment A

### Participants

#### TNI

### Stationary Source Audit Sample Expert Committee

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

## Attachment B

### Action Items – Stationary Source Audit Sample Expert Committee

	<b>Action Item</b>	<b>Who</b>	<b>Date Added</b>	<b>Expected Completion</b>	<b>Completion</b>
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	
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	

	<b>Action Item</b>	<b>Who</b>	<b>Date Added</b>	<b>Expected Completion</b>	<b>Completion</b>
26	Look for older tables that were used to calculate the original limits	Tom	8/26/19	TBD	
28	Prepare DRAFT letter to the Board and CSDP EC. Send for email comment.	Sheri	10/7/19	10/14/19	
30	Send out final DRAFT of SOP 6-100 for comment.	Tom	12/2/19	12/6/19	
31	Send out final DRAFT of EPA letter for comment.	Tom	12/2/19	12/3/19	



## Attachment D: FINAL DRAFT Letter to EPA

### Comments on Stationary Source Audit Program; Notification of Availability and Request for Comments

DRAFT – December 2, 2019

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The NELAC Institute (TNI) is a 501(c)(3) non-profit organization whose mission is to foster the generation of environmental data of known and documented quality through an open, inclusive, and transparent process that is responsive to the needs of the community.

TNI manages a Stationary Source Audit Sample (SSAS) program that includes the following components:

- Recognition of Accredited Audit Sample Providers (AASP)
- Recognition of Audit Sample Provider Accreditors
- Maintenance of a central database for participants to report their data.
- A system whereby regulators can access data from the central database,
- A system where participants can see their own data, and
- A SSAS table that contains methods, analytes, concentration ranges, and acceptance criteria for audit samples.

TNI also manages a Consensus Standards Development Program. TNI is accredited by the American National Standards Institute as a voluntary consensus standards organization and fully conforms to all requirements in OMB circular A-119. TNI's Stationary Source Audit Sample Expert Committee is one of 10 expert committees in this program and develops consensus standards for this program.

TNI offers the following comments in response to the notice published on September 11, 2019.

The greatest obstacle to Providers is that Stationary Source Audit Samples are far more labor and time intensive than Proficiency Test (PT) samples. As a result, most PT Providers are not willing to devote their resources to becoming an Accredited Audit Sample Provider.

The problem then becomes the EPA's definition of "commercially available". Due to the lower demand for Stationary Source Audit Samples than for PT samples, redefining "commercially available" to encompass only one accredited provider would be a

reasonable remedy for the current situation. A change in the definition which allows for only one Provider would be in keeping with many State accreditations which mandate that a PT be analyzed if one is available from any vendor, even when only one vendor sells the PT of interest.

The Committee suggests that a caveat be added to the definition of “commercially available” to acknowledge the lower demand of audit samples and limited number of potential AASPs. One idea for this caveat is a statement similar to the following: “Should only one AASP produce a given audit sample, the audit requirement would remain in force, and the facility or its designee must still obtain an audit sample. The single AASP providing the audit would not be allowed to raise their prices on any audit sample for which they are the sole Provider by more than [some factor] per year to avoid the possibility of artificially inflating the prices for their product. For innovative Audit offerings, additional considerations would be needed.”

In addition, the Committee believes that the audit program would be more robust if the allowable concentration ranges for several method/analyte combinations were lowered. This would create audit samples that better reflect the concentrations found in the field samples and thus provide a better representation of the data being submitted. The SSAS Expert Committee is currently working on a Standard Operating Procedure to lower the concentration ranges and allow for new method/analyte combinations to be added to the Stationary Source Audit Sample Table (SSAS Table).

The Committee is of the opinion that audit samples increase the legal defensibility of the data associated with them, and we are working towards making it less onerous for a new Provider to join the program so that the program can resume its mandatory status, as it is currently voluntary at the Federal level.