

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

March 1, 2021

1. Roll call and approval of minutes:

Chair, Sheri Heldstab, called the TNI SSAS Executive Committee meeting to order by teleconference on March 1, 2021, at 2:30 pm Eastern. Attendance is recorded in Attachment A – there were 8 committee members present. Associate Member: none.

The January meeting minutes were distributed for Committee Review. A motion was made by Tom to approve the January 19, 2021 minutes as written. The motion was seconded by Mike S. and unanimously approved.

2. Action Items

Sheri noted that the Action Item Summary (Attachment C) has been update for 2021. She and Ilona met and removed the items completed in 2020.

Action Item #25: FoPT would need to be for Air and Emissions - not SSAS. Air may include a lot more. Shawn is looking at a feasibility study. Shawn is concerned that people may not use it and that is why feasibility needs to be looked at. Sheri will sit in on some PTPEC calls in the future. People may be interested in a PT as long as Sample Audits are not available.

Action Item #30: Sheri would like to start working on the letter to EPA in April – request change to code of federal regulations to “if one is available”.

3. Public Webinar

The public webinar was held on 2-16-21. Comments will still come in through 3/19/21. There were 21 people in attendance.

There were more questions about how the program worked. She doesn't expect to get a lot of comments by email.

4. Charter

Sheri reviewed the current charter and commented that it read like a “To Do” list. She discussed what a charter should look like. Ilona provided a copy of the PTPEC Charter

and Sheri also reviewed the PT Expert Committee charter. After these reviews, she started updating the SSAS charter that she shared with the Committee on Webex.

The Committee spent quite a bit of time talking about whether a new stakeholder group is needed for this Committee. Currently the Committee is using Lab, AB and Other. Jerry Parr thinks it should be Lab, FSMO, AB and Other. There was discussion about a 5th category of Audit Sample Providers instead of having them in Other. In conclusion, the Committee decided 4 categories should work. The topic will be further discussed by email and will be on the next meeting agenda.

Updates were made to the Charter and can be found in Attachment C.

5. New Business.

None.

6. Next Meeting

The next meeting will be March 15, 2021 at 2:00pm Eastern. Ilona will send out a WebEx invitation the day of the meeting.

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

Sheri adjourned the meeting at 4:12 pm Eastern. (Motion: Mike S. Second: Bill. Unanimous)

Attachment A

Participants TNI

Stationary Source Audit Sample Expert Committee

Members	Rep	Affiliation	Contact Information
Sheri Heldstab (2024) CHAIR Present	Lab	Chester LabNet	sheldstab@chesterlab.net
Tom Widera (2023) VICE-CHAIR Present	Lab	Pace Analytical	Thomas.widera@pacelabs.com
Ilona Taunton, Program Administrator Present		TNI	Ilona.taunton@nelac-institute.org
Ed MacKinnon (2022) Absent	Other	TRC Env Corp (Stationary Source Tester)	emackinnon@trcsolutions.com
Gregg O'Neal (2023) Present	AB	NC DAQ	gregg.oneal@ncdenr.gov
Katie Gattis (2023) Present	Lab	Element One Inc.	katie.gattis@e1lab.com
Michael Klein (2023) Absent	AB	NJ DEP	michael.klein@dep.nj.gov
Michael Schapira (2024) Present	Lab	Enthalpy Analytical LLC	Mike.schapira@enthalpy.com
Bill Guyton (2023*) Present	Other	ERM (Tester)	bill.guyton@erm.com
Brian Miller (2023*) Present	Other	ERA (Provider)	brian_milller@waters.com
Patrick Selig (2024*) Present	AB	ANAB (AB/PTPA)	pselig@anab.org

*Asterisk denotes a person who may serve an additional term.

Attachment C - Charter

Stationary Source Audit Sample Expert Committee (SSAS)
Charter (Revised: X-X-2021)

Mission:

Develop and maintain consensus standards for the EPA's Stationary Source Audit Program (SSAP) that address the following elements:

- Roles and responsibilities of program participants.
- Manufacturing of Audit Samples.
- Responsibilities of Audit Sample Providers.
- Accreditation of Audit Sample Providers.
- Management of Audit Sample results.
- Management of the Stationary Source Audit Sample table, including acceptance criteria.

Composition of the Committee:

No more than 15 TNI members representing applicable stakeholder groups; each serving three-year terms with a maximum of two consecutive terms. Members may be approved to remain on the Committee for longer than two consecutive terms by a vote of the Committee and with the approval of the CSDEC.

- Stakeholders include members of the air testing community:
 - Laboratory
 - Field Testers (FSMO)
 - Regulators/Accrediting Bodies
 - Other (Providers, facilities, consultants, etc.)
- A Chair and Vice-Chair are elected from among the committee membership; each serving 1-year terms.
- Membership must maintain balance so that no stakeholder group has a majority.
- Associate members are allowed.

Objectives:

1. Develop and maintain consensus standards for the manufacture of Audit Samples that ensures Audit Samples provide equal challenge to participants regardless of manufacturer.
 - **Success Measure:**
 - Failure rates as summarized by the SSAS Table and evaluated by the SSAS Committee show consistency across Audit Providers.
2. Develop and maintain consensus standards for the Stationary Source Audit Program that are practical, implementable, and meet the requirements as described in 40 CFR 60.8 & 63.7.
 - **Success Measure:**
 - Continued approval of SSAS Committee by the EPA as a Voluntary Consensus Standards Body (VSCB).

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Deleted: The SSAS Expert Committee is composed of members of the air testing community, including but not limited to State Regulators, EPA, Stack Testers, Analytical Labs, Providers. Due to the nature of this committee, membership is not necessarily limited to TNI constituencies of AB, Lab and other. The SSAS Expert Committee will be composed of no more than 15 members and will maintain a balance of representation from the community, so no one sector can influence decisions. Associate members are not limited in number and are not required to demonstrate balance in their number.

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Success Measures¶
 Recognition of TNI SSAS Program by EPA¶
 Maintain program for the audit sample providers¶
 TNI approval of SSAS Standard¶

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Success Measures¶
 Expand scope of SSAS Program (update concentration ranges, expand method and analyte list)¶
 Refine acceptance criteria – how they are derived, representativeness of the sample, etc.¶
 Submit to EPA Method 25Z as potential alternate to Method 25¶

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3. Develop and maintain consensus standards that support Audit Sample design (analyte, matrix, concentration and acceptance criteria) appropriate to evaluate a Participant's accuracy for the Method for which the Audit Sample was manufactured.

• Success Measure:

- o Successful accreditation of Audit Sample Providers showing compliance with design specified in the SSAS Table.

4. Maintain Currency of SSAS Table (Biennial Review)

• Success Measures

- o Pass rate for all audits deemed acceptable
- o Recalculation of control limits for pass rates not deemed acceptable
- o PTEPEC approval of SSAS Table???

5. Maintain all pertinent documentation relevant to SSAS Committee activities.

• Success Measures

- o Documentation of Committee activities is in compliance with the most recent version of TNI SOP 2-100 & 2-101.

6. Promote the development of an Audit Sample that challenges both the Stationary Source Tester and the Laboratory

• Success Measures

- o Audit Sample results include uncertainty from Field activities
- o Promote the development of duplicate Audit Samples that include field train recovery activities.

Decision Making:

▼ Decisions of the SSAS Expert Committee are generally made by a majority vote in the presence of a quorum during teleconferences, face-to-face meetings, or by electronic voting, unless an alternate voting procedure is determined to be necessary by the committee.

▼ Decisions will be made, consistent with the requirements, in the current revisions of TNI SOPs 1-102.

Available Resources:

- Volunteer committee members.
- EPA Program documentation as described in the Code of Federal Regulations.
- Industry experts.
- Teleconference and web-based services
- TNI Website and other TNI support services (administrative, IT, etc.)

Anticipated Meeting Schedule:

- Monthly teleconferences (open to all full and associate members and the general public)
- Additional teleconferences as needed
- Face-to-face meetings during the semiannual TNI Forums (open to all full and associate members and the general public)

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Engage more Stationary Source Testers¶
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Attachment D: SSAS Committee Action Item Summary – 2020

Item	Task Description	Document Number	TNI Contact	Task Added	Start Date	Complete Date	External Communications	Comments
2	Prepare general summary of what the committee plans to change in the current Standard and why. First DRAFT. – For Public Webinar	SSAS Vol 1 All Modules	Sheri	4/23/18	4/23/18	1/19/21	None	In progress. [discussed and agreed to “on hold” again 2/18/20]
3	Send ideas on Storage Condition issue to Tom so he can summarize them for an agenda item in July.		Committee	6/18/18			Brian Miller	[On hold until SOPs 6-100, 6-101, & 3 modules completed]

Item	Task Description	Document Number	TNI Contact	Task Added	Start Date	Complete Date	External Communications	Comments
13	Review and update SOP 6-101: SSAS Table Management	SOP 6-101	Committee	1/21/2019	5/9/18		Sent to Policy Committee for review.	In Progress – renewed project 5/4/20 Ilona to email Mei Beth to ask about new analyte codes for SSAS table. On hold until IT completes SOP. Next Policy meeting is 11/6/20. 7/6/20. IT Committee reviewing/updating SOP on analyte codes 9-21-20 (discussed in Policy 9-18-20). Not necessary – reworded in SOP. 7/6/20: Include checklist at the end of the SOP for what the committee needs to review/consider. 11/16/20. SOP review complete. Will be voted on during December meeting. 12/7/20. Completed and will be voted on 1/19/20. 1/19/21: SOP 6-101 finalized and ready to go to Policy.
14	Review SSAS table control limits	SSAS Table	Committee	2/18/20				[On hold until after SOPs & Modules sent to respective committees for approval]
15	Update SSAS Charter	SSAS Charter	Sheri	2/18/20	3/1/21			7/20/20: SOP 6-101 5.3.3. Management of the SSAS table is part of the responsibilities of the committee. Needs to be added to the charter.

Item	Task Description	Document Number	TNI Contact	Task Added	Start Date	Complete Date	External Communications	Comments
17	Consider contacting PT Providers about providing Audit Samples after more procedures and modules are complete.		Committee	2/18/20			PT Providers	[On hold until after SOPs & Modules sent to respective committees for approval]
22	Have SSAS Table w/same format as FoPT's re: current, future, rev# & effective date	SSAS Table	Sheri/Ilona	8/24/20				8/24/20 Sheri will look into this as IT activities slow down. 9/21/20 Work w/Ilona on this
24	Update TNI SSAS Committee info on TNI website		William	9/22/20	6/1/20			Emailed to add Bill to TNI website 6/1/20- emailed again 7/27/20, 8/24/20 Emailed to add Brian and fix Tom's info 8/24/20, add Pat Selig. Discussed w/Ilona on 9/21/20. William backlogged.
25	Discuss possibility of FoPT for SSAS		PTPEC meeting (possibly end of 2020?) Shawn Kassner	9/22/20				Discuss possibility of creating FoPT for "Air & Emissions"

Item	Task Description	Document Number	TNI Contact	Task Added	Start Date	Complete Date	External Communications	Comments
26	Fix "Matrix" → "Quality Systems Matrix" on SSAS Table	SSAS Table	SSAS Committee/William	9/24/20				<p>"Matrix" header of SSAS Table not in agreement with glossary term or with SOP 6-101.</p> <p>10/19/20 - The CSDP EC said to "make a new definition if needed" during their 10/8/20 meeting.</p> <p>11/7/20- Sheri will ask at Dec CSDP EC meeting.</p> <p>Sheri to ask at Dec CSDEC meeting: SSAS can change table without going through PTPEC.</p> <p>Yes - 12/7/20</p>
27	Biennial Review	SSAS Table	SSAS Committee	10/5/20				Review SSAS table every 2 years.
28	Review SSAS Modules to prepare for Public Meeting.	Modules 1, 2, and 3	SSAS Committee	10/19/20	1/19/21	1/19/21		<p>10/19/20 - The TNI Lab Standard does specify that PT Providers need to supply data for calculating limits. Does the SSAS Standard have something similar? Should take a look at this when the Standard update is started again.</p> <p>1/19/21: tables reviewed and finalized for public meeting.</p>
29	Public Meeting tentatively set for mid February.		SSAS Committee	11/2/20	1/19/21	2/16/21		<p>12/7/20- Public meeting set for 2/16/21.</p> <p>1/19/21: Ilona to send template for presentation and language for posting.</p>
30	Contact EPA re: change to # AS providers in CFR		Gregg O'Neill (Committee member)	1/14/21	12/4/20			Based on info from EPA call on 12/4/20.
31	Discuss Committee relationship with PTPEC.		SSAS Committee	1/19/21	TBD			1/19/21: Ilona will add to PTPEC Action Summary too.

