

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

May 17, 2021

1. Roll call and approval of minutes:

Chair, Sheri Heldstab, called the TNI SSAS Executive Committee meeting to order by teleconference on May 17, 2021, at 2:00 pm Eastern. Attendance is recorded in Attachment A – there were 8 committee members present. Associate Members present: Carl Kircher.

The March 15, 2021 and April 19, 2021 meeting minutes were sent by email and reviewed on Webex. A motion was made by Ed to approve the March 15, 2021 minutes as written and sent with the agenda. The motion was seconded by Gregg and was unanimously approved.

A motion was made by Michael S. to approve the April 19, 2021 minutes with a correction to the meeting date and sent with the agenda. The motion was seconded by Ed and was unanimously approved.

Michael Schapira would like to stay on as a voting member after his retirement in July. For the purposes of balance, he will be an “Other”.

2. Charter

At the last CSDP EC meeting, it was decided not to add an objective about documentation. Sheri proposed deleting #6. There was general agreement.

The Committee took one last look at the Charter and no further changes were suggested.

A motion was made by Michael S. to approve the Charter as sent with the Agenda with the deletion of Section 6. The motion was seconded by Patrick and unanimously approved.

The final Charter can be found in Attachment C.

3. Letter to EPA

Sheri prepared a DRAFT letter to get the Committee started. Ilona recommended language to emphasize the letter is coming from TNI.

There was a question about whether the following language should be left in: “This change would have the additional benefit of creating a parallel structure between the SSAP and the drinking water and wastewater Proficiency Testing programs, which do not require two separate providers.” The decision was to delete it. Also delete: “when they observe that the remaining Provider has no competition”.

Additional editorial changes were made and the Committee completed a DRAFT of the letter for Jerry Parr and the Committee’s review. The final DRAFT can be found in Attachment D.

(Addition: Jerry reviewed and had no recommended changes.)

4. New Business.

None.

5. Next Meeting

The next meeting will be June 21, 2021 at 2:00pm Eastern. Ilona will send out a Webex invitation the day of the meeting.

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

Sheri adjourned the meeting at 3:36 pm Eastern. (Motion: Gregg Second: Michael S. 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) Present	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) Present	AB	NJ DEP	michael.klein@dep.nj.gov
Michael Schapira (2024) Present	Lab	Enthalpy Analytical LLC	Mike.schapira@enthalpy.com
Bill Guyton (2023*) Absent	Other	ERM (Tester)	bill.guyton@erm.com
Brian Miller (2023*) Absent	Other	ERA (Provider)	brian_milller@waters.com
Patrick Selig (2024*) Present	Other	ANAB (AB/PTPA)	pselig@anab.org

*May serve another 3-year term.

Stationary Source Audit Sample Expert Committee (SSAS) Charter

05/17/21

Mission:

Develop and maintain consensus standards for the EPA's Stationary Source Audit Program (SSAP) that meet or exceed the requirements as described in 40 CFR 60.8 and 63.7.

Composition of the Committee:

No more than 15 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 Consensus Standards Development Executive Committee.

- Stakeholders include members of the Stationary Source Emissions Testing community:
 - Field Sampling and Measurement Organization (Stationary Source Samplers),
 - Laboratories,
 - Accrediting Bodies (Regulators and ABs),
 - Other (Providers, Facilities, Air Quality Consultants, etc.).
- A Chair and Vice-Chair are elected from the current committee membership; each serving 1-year terms. The Chair and Vice-Chair may serve more than one term, but must be elected annually.
- Membership must maintain balance so that no stakeholder group has a simple majority.
- Associate members are allowed.

Objectives:

1. Develop and maintain consensus standards for the manufacture of Audit Samples that ensure Audit Samples provide equal challenge to Participants, regardless of manufacturer.

Success Measure:

- Finalized version of the SSAS Volume.

2. 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/Analyte combination for which the Audit Sample was manufactured.

Success Measure:

- Accreditation of Audit Sample Providers showing compliance with design specifications as given in the SSAS Table,
- Finalized version of the SSAS Volume.

3. Develop and maintain consensus standards for the requirements and performance of Audit Samples Provider Accreditors (ASPAs) that ensures Audit Sample Providers are accredited in a manner that ensures the Success Measures given in Items 1 and 2, above, are consistently achievable between Audit Sample Providers.

Success Measure:

- Finalized version of the SSAS Volume.

4. Develop and maintain consensus standards for the acquisition, storage, preparation, analysis, and reporting of Audit Samples and their results by Participants in the SSAP.

Success Measure:

- Finalized version of the SSAS Volume.

5. Maintain Currency of SSAS Table (Biennial Review).

Success Measures

- Pass rate for all Audit Samples for Method/Analyte combinations deemed acceptable,
- Recalculation of control limits for pass rates deemed not acceptable,
- SSAS Committee approval of SSAS Table.

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

Success Measures

- Discussions with Audit Sample Providers regarding the feasibility of gaseous Audit Samples,
- Discussions with Audit Sample Providers and Source Samplers regarding the feasibility of an Audit Sample requiring Field Train Recovery activities,
- Discussions with Audit Sample Providers, Source Samplers, and Laboratories regarding the feasibility of a parallel audit sample where part of the Audit Sample is prepared in the field and part of the Audit Sample is prepared in the laboratory,
- Discussions with Audit Sample Providers, Source Samplers, and Laboratories regarding co-located train audit samples.

7. Public outreach to promote the use of Audit Samples for quality assurance purposes, and encourage the return of the Program to mandatory status.

Success Measures

- Continued use of Audit Samples while Program is voluntary,
- Discussions with potential Audit Sample Providers to attempt to get more than one Audit Sample Provider,
- Audit samples become a mandatory requirement for all permitted source tests.

Available Resources:

- Volunteer committee members,
- EPA Program documentation as described in the Code of Federal Regulations,
- Environmental technical community, including staff from the EPA's Office of Air and Radiation,
- Teleconference and web-based services,
- TNI Infrastructure,
- Other TNI Expert Committees,
- TNI administrative support.

Anticipated Meeting Schedule:

- Monthly virtual meetings (schedule and minutes published on the TNI website);
- In-person meetings during the semiannual TNI Forums;
- Additional meetings as needed.

Attachment D: Draft Letter to EPA

Mr. Steffan Johnson
EPA - Environmental Measurement Technology Group
[Date]
Re: Stationary Source Audit Program

Dear Mr. Johnson,

The NELAC Institute (TNI) is writing concerning the continued suspension of the Stationary Source Audit Program (SSAP), and to ask that changes be made to the CFR that would eliminate the suspension of this program.

TNI's Stationary Source Audit Sample (SSAS) Expert Committee, serving in its role as the current Voluntary Standards Consensus Body (VSCB) in the program, would like to see the Program reinstated. The continuing barrier to making the Program mandatory again has been the phrase "when commercially available" which is currently defined as "two or more independent accredited audit sample providers (AASP) having blind audit samples available for purchase".

TNI respectfully requests that an effort be made to change this language such that the definition of "commercially available" would be defined as "when an audit sample is available from an accredited audit sample provider" in 40 CFR Parts 60.8 and 63.7.

TNI believes making the program active again is in the best interests of the environment and public health, as data generated under the program is more likely to be demonstrably accurate. In addition, the facilities are better served when the program is active, as they have more defensible data on which decisions are based.

Due to the beliefs stated above, we respectfully request that you attempt to change the language in the CFR in such a manner that the program will once again be mandatory.

Please let me know if you have further questions or concerns. The favor of a reply is requested.

Sincerely,

Jerry Parr
Executive Director, TNI

cc: Ned Shappley, Ray Merryll, SSAS Expert Committee

Attachment E: 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	5/17/21		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. 3/15/21: Committee asked to review and comment by email on changes Sheri made.

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	Verified on 3/15/21		Add Bill, Brian and Patrick. 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" 3/15/21: Air & Emissions has been added to list of feasibility studies PTPEC will look at. They will invite Sheri when it is on the agenda.
26	Fix "Matrix" → "Quality Systems Matrix" on SSAS Table	SSAS Table	SSAS Committee/William	9/24/20				"Matrix" header of SSAS Table not in agreement with glossary term or with SOP 6-101. 10/19/20 - The CSDP EC said to "make a new definition if needed" during their 10/8/20 meeting. 11/7/20- Sheri will ask at Dec CSDP EC meeting. Sheri to ask at Dec CSDEC meeting: SSAS can change table without going through PTPEC. Yes - 12/7/20

Item	Task Description	Document Number	TNI Contact	Task Added	Start Date	Complete Date	External Communications	Comments
27	Biennial Review	SSAS Table	SSAS Committee	10/5/20				Review SSAS table every 2 years. - Some methods may need to have limits updated. Ag and M6/M8. (On hold until Standard update.)
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		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. 1/19/21: tables reviewed and finalized for public meeting.
29	Public Meeting tentatively set for mid February.		SSAS Committee	11/2/20	1/19/21	2/16/21		12/7/20- Public meeting set for 2/16/21. 1/19/21: Ilona to send template for presentation and language for posting.
30	Contact EPA re: change to # AS providers in CFR		Gregg O'Neal (Committee member)	1/14/21	12/4/20			Based on info from EPA call on 12/4/20. After April 2021, write letter to ask for change to CFR to "if one is available". 5/21/21: Draft completed and sent to Jerry and committee for review.
31	Discuss Committee relationship with PTPEC.		SSAS Committee	1/19/21	TBD			1/19/21: Ilona will add to PTPEC Action Summary too. 4/19/21: Is the PTP Executive Committee at all involved in approving the Standard like the NELAP AC approves the lab standard and the NEFAP EC approves the field standard?