

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

May 29, 2019

1. Roll call and approval of minutes:

Vice-Chair, Sheri Heldstab, called the TNI SSAS Executive Committee meeting to order by teleconference on May 29, 2019, at 2:00 pm Eastern. Attendance is recorded in Attachment A – there were 6 committee members present. Associate Members present: Mark Ludwiczak, Bill Guyton, Ray Merrill, Kevin McGee, Kelly Dorsi, Eugene Chen, Jerry Parr, Khoi Nguyen, Stanley Tong, Jim Serne, Katie Shonk, Kevin McGee, Craig Huff and Mike Deines.

The minutes will be reviewed by email.

2. Update on Loss of Provider

On May 21, Sigma-Aldrich announced it was withdrawing from the program as a provider of audit samples, leaving ERA as the sole provider. According to the EPA final rule published in 2010, there must be at least 2 providers. EPA issued a notice, on the EPA EMC website, on May 24 suspending the program until a second provider is accredited by a TNI PTPA.

Jerry reached out to LGC Standards in Great Britain to see if there is any interest. They don't match the PT compounds the US uses, so this may cause them issues. They are accredited to ISO/IEC 17043, but they would still need to be accredited by one of our PTPAs to the TNI Standard. They have PT samples, not audit samples. This option does not look likely. (*Addition: LGC declined.*)

Jerry prepared a DRAFT letter to help the committee explore continuing the program with one provider. Jerry thinks the letter should be sent to the regulators to get input and he would like to get input from people on the call. The letter needs fine tuning.

21,500 analyte results have been reported. Tom noted that there is a handful of labs that do the majority of the work. There are 125 labs noted, but there really aren't that many doing the majority of the work. Method 26 is a big one. Silver's only been requested 53 times. Others have had only one request.

Craig noted this is not a high margin product for ERA, but it is still a viable business and they are interested in continuing.

Helping to streamline the audit program would help more people want to be a part of it. Making it possible for there to be more than one sample ordered helps. The Committee has also been looking at some changes in the Standard.

Craig (ERA) will continue to offer the product line until there is no demand for it. Are the labs getting value out of the program? This would help them gauge the market going forward.

Sheri asked for input by different stakeholder category:

REGULATORS

What do you think?

Would you continue to use them with one provider?

Michael in NJ - His authority is rooted in Federal ... they are not going to require them but they will encourage their continued use. The EPA's original intent was to move toward gaseous based audits that are actually sampled through the sampling trains and you are auditing the tester and the labs.

- Gregg commented that it is a good idea, but he is not sure EPA has procedures for this.
- Craig agrees it would be ideal. After looking at other gas samples, it would not make it cheaper. He would also want to understand how well it worked before investing too much into something like this.
- Ray Merrill said this was done for Method 25 for EPA in the past. There was also a program for Method 18 samples. The audit results showed it can be done. He noted that when they made these audit samples they were at least 3x the cost of the audit samples going out today. Craig asked if he could see this information and data. Ray asked him to send him an email.
- Craig noted that PT Providers have to be accredited to make this. The model was much different than a PT because each sample had to be tested by the PT Provider.

Gregg in NC – same situation. Without federal register requirement, they don't do anything more stringent than the Federal register. He would encourage the use, but no regulatory authority.

Mark – Oregon. He is not sure that they can require it. He thinks a recommendation from his state would make people use it. He would like to see it continue.

Ray Merrill - He was not part of the writing of Federal notice. The requirement was to have two providers. Ned has approved language and a game plan for moving forward. He said the rule is what it is and they will be requesting comments on the direction the program should take. The audit program is different than PT because they want a test on a per test basis. It doesn't fit into the normal PT business model. They are requesting

comments on the direction of the program. Should they be looking at PTs instead? PTs may fit better into the TNI. Ray said it is not profitable to be a provider through TNI. The costs would need to come down – that is why his company did not pursue accreditation. *(Addition: Ray was discussing Method 18 samples testing both the lab and the tester. However, the Method 18 samples were just being forwarded to the lab)*

Sheri – there is nowhere in the TNI program that says it has to have two providers.

Jerry - SSAS was a voluntary/independent effort that TNI took on to do. EPA was having budget issues and checked in with TNI to see if they would want to take it. There was not directive or mandate for TNI to do this. TNI has no input into what the regulations say.

Ray – His issue is that their methods are changing and they are looking at lower levels. He'd rather see an audit program at the lower levels. Sheri noted SSAS is actually working on a procedure to lower the concentrations through two SOPs they are working on. Ray noted that they had some issues with how the limits are calculated and he hopes this has been addressed in the SOPs. He would like to see more matrix specific audit samples. These two items are key to moving the audit sample program forward.

A Federal Notice will be posted to get the comments. Ned would like to get this out within a week.

Tom – Charles Simon had investigated having gas sample manufacturers make the samples and then the Providers would administer the audits. The gas sample manufacturers had expectations that the Providers would purchase several hundred cylinders at a time. Tom mentioned that ERA would not agree to that due to the high cost up front for the purchase of these samples. *(Addition: The samples discussed were for Method 25).*

TESTERS

What is the value of the SSAS Program?

Jim Serne – He think it has limited value. The good labs have been identified and the data shows the pass rate is 99%. The cost of the program should also be considered. They cost more than originally predicted. Need to look at the cost benefits of the Program. Historically they used to purchase QC samples to test labs. He does not think industry will continue to purchase the samples if there is not a regulatory requirement. He suggested doing a survey to get more input from all the different stakeholder categories. Michael Klein noted that this points out a strength of SSAS. It helped testers identify the good labs.

Jim also commented that it would be great if testers could have some sort of access to the database to see how the labs are doing. Needs transparency. Jerry noted this was a decision of the original committee. This Committee can change it.

Ed McKinnon – They are not representative of the matrix of the associated samples. He has concerns about how representative the results are. Sheri noted that there is work being done on the Standard to help with this. It would be hard to matrix match.

Kelly – Bison will continue to use audit samples from ERA.

Sheri asked whether TNI has a good reason to continue the SSAS Program? Sounds like regulators will recommend the use of audit samples. Some testers would continue to do it regardless of requirement and others think it is no longer needed.

Send a Survey?

- Contact information is missing in some of TNI's records because some of this wasn't requested when the TNI database was started.
- Jerry is encouraged by the information today – many regulators would like to recommend continued use of the audit samples and ERA is willing to continue to make them. We need more information to see what the different stakeholders are thinking.
- ERA can also help with the mailing list. They have contact information from at least the last 5 years. The SSAS Expert Committee also put together a mailing list for the webinar. We need to coordinate between ERA, the SSAS list and TNI's list to put a solid mailing list together.

LABORATORIES

Mike S – It has helped to identify the good labs and continuing it would be good. The improvements in the works are good. He's curious if people will continue if it is voluntary.

Sheri – An audit is the same as a sample and it doesn't affect their bottom line. Agrees with Mike S.'s comments. Concerned if they stop running them, eventually the testing community won't know the good labs anymore. From a data defensibility stand point, there is still an advantage to using them.

ADDITIONAL COMMENTS

Gregg – Are any of the labs required to run the sample audits as part of their accreditation. Sheri noted that they are not required to run audit samples or PT samples for air analyses related to their TNI accreditation. Jerry noted that TNI does not have an Air PT Program. Mike S. noted that his lab does do PTs where audit samples are not available.

Sheri noted that during accreditation audits the assessors look at their audit samples and don't look for PTs.

The next step is to work on the DRAFT letter that Jerry put together for regulators. It sounds like the audience will need to be expanded beyond just regulators. This is something the SSAS Expert Committee needs to work on.

Ilona commented that perhaps the Committee should meet again sooner to work on the letter so it can get out earlier. Everyone agreed. A meeting will be planned by email.

3. Review of SSAS Expert Committee Work

The SSAS Expert Committee has been working on updating Modules 1, 2 and 3 of the Standard. Sheri reviewed some of the changes they are looking at. She used the outline to review this information. Ilona provided information on how TNI updates the standards and emphasized that the outlines are not set in stone. They are used to get feedback.

Gaseous samples are somewhat cost prohibitive and that is why they haven't gotten any further on these. Gregg noted that procedures would also need to be put in place.

4. New Business.

- Sheri encouraged new people in the call to continue to sit in on SSAS meetings. Send Sheri and email and invitations will be sent.

5. Action Items

The action items can be found in Attachment B.

6. Next Meeting

The next meeting will be planned by email. *(Addition: The next meeting was planned for June 5, 2019 at 2pm Eastern.)*

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

Sheri adjourned the meeting at 3:40pm 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			Ilona.taunton@nelac-institute.org
Ed MacKinnon (2022) Present	Other	TRC Env Corp (Stationary Source Tester)	emackinnon@trcsolutions.com
Gregg O'Neal (2021*) Present	AB	NC DAQ	gregg.oneal@ncmail.net
Katie Gattis (2020) Present	Lab	Element One Inc.	katie.strickland@e1lab.com
Michael Klein (2021*) Present	AB	NJ DEP	michael.klein@dep.nj.gov
Mike Hayes (2019*) Absent	Other	Linde (Provider)	mikeh@spectragases.com
Michael Schapira (2022*) Present	Lab	Enthalpy Analytical LLC	Mike.schapira@enthalpy.com
Sheri Heldstab (2021*) Present	Lab	Chester LabNet	sheldstab@chesterlab.net

Attachment B

Action Items – TNI 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	
12	Discuss matrix matching with Sigma.	Tom	10/15/18	11/15/18	
13	Contact Ned Shappley about PT concentrations to complete SOP 6-100.	Tom	10/15/18	11/15/18	
14	Contact Ken Jackson and Bob Wyeth about glossary definitions to make sure there are no conflicts with SOPs being worked on.	Tom	10/15/18	11/15/18	
15	Provide Ilona with notes from New Orleans meeting so August minutes can be completed.	Tom	10/15/18	TBD	
16	Contact Carl and Shawn about equations used for limits. Can they provide wording for the SOP?	Tom	1/22/19	2/24/19	

	Action Item	Who	Date Added	Expected Completion	Completion
17	Talk to Maria about CRA and get posted on the SSAS website.	Tom	1/22/19	2/24/19	
18	Update SOP 6-100 based on review during meeting.	Tom	1/22/19	2/24/19	
19	Discuss impact of 40 CFR 60.8 g(2)vii – last sentence with Ned.	Tom	2/25/19	3/1/19	
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