

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

**June 17, 2019**

## 1. Roll call and approval of minutes:

Chair, Tom Widera, called the TNI SSAS Executive Committee meeting to order by teleconference on June 17, 2019, at 2:15 pm Eastern. Attendance is recorded in Attachment A – there were 6 committee members present. Associate Members present: Stanley Tong, Eugene Chen, Mike May, and Khoi Nguyen.

The minutes will be reviewed by email.

## 2. Update on Survey

Brief Summary: There have been 19 responses so far. 17 agreed that the SSAS Expert Committee is doing their job. 11 agreed the sample audit program had value. 11 agreed there is a cost benefit. 12 agreed they will continue to use audit samples.

The Committee would like to send a reminder for people to do the survey.

Tom noted that all the regulators were going to highly recommend continuing to use audit samples.

Tom noted a few comments he saw:

- Interest in lowering the concentration range.
- 5 or more suggestions for improving the program. Would like to see entire process tested – not just labs.
- There was positive feedback on continuing the program – even though it is voluntary.
- Do a PT.
- Expand the analyte list. (Sheri agrees with this.)

## 3. Standard Update

The Committee finished looking at Module 1, so Module 3 will be looked at today.

Section 1.3 b) – OK

Section 3.2 and 3.15 – OK. The definitions in general will be checked to make sure there are no conflicts with the TNI Glossary.

Section 4 – Flow chart moved to the end.

Section 4.1.1 – OK (The Tester usually does all of this. See new Section 4.3.1.) Mike S. asked if Designee should just read Tester? Committee decided “no”.

Section 4.1.2 – Mike asked if 4.1.2.2 is really being done. Is the Provider informed if the Facility decided to send the audit sample to an alternate lab. They get them and have to ask them to change the lab. Katie noted that she has to contact the regulator and the Provider. She asked if it should say it needs to be done before results are provided? Mike said they are asked to contact the Provider to change it. It happens often enough, and Sheri noted that the Tester should be taking care of this. The Laboratory doesn’t have enough of the details to know that the correct audit sample was sent.

Ultimately the goal is to make sure the change is documented. Language will be left as is. It is not the Laboratory’s responsibility. Add a Section 4.3.1 – “In the event the tester is serving as the designee for the facility (See Section 4.1), the tester will assume the responsibilities of the facility as documented in Section 4.1.”

Section 4.2 – Section 4.2.2 is one of the more difficult things the Provider has to deal with. If they don’t hear back in 15 days, they go ahead and send it.

Added to Section 4.1.2: “In order to allow for the required Regulatory review time and shipping, audit samples should be ordered a minimum of 21 days in advance of the proposed testing event.” This helps with the timing in Section 4.2.

Add to first sentence of Section 4.2.2 – “as submitted by the Provider ...”. Gregg is waiting for this information and this helps people know what they need to do.

There is more work to do in Section 4.2 that will be continued at a future meeting. Tom will finalize the changes made today and send them to everyone for review and consideration before the next discussion on Volume 3.

#### 4. New Business.

- None

#### 5. Action Items

The action items can be found in Attachment B.

#### 6. Next Meeting

The next meeting will be July 22, 2019 at 2pm Eastern. Ilona will send out a Webex invitation on the 22<sup>nd</sup>.

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

Tom adjourned the meeting at 3:35pm Eastern. Motion: Michael S Second: Michael K  
Unanimous approval.

## 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>Absent</b>	Other	TRC Env Corp (Stationary Source Tester)	emackinnon@trcsolutions.com
Gregg O'Neal (2020*)  <b>Absent</b>	AB	NC DAQ	gregg.oneal@ncmail.net
Katie Gattis (2020)  <b>Present</b>	Lab	Element One Inc.	katie.strickland@e1lab.com
Michael Klein (2020*)  <b>Present</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 – TNI PT Executive 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	
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	
17	Talk to Maria about CRA and get posted on the SSAS website.	Tom	1/22/19	2/24/19	

	<b>Action Item</b>	<b>Who</b>	<b>Date Added</b>	<b>Expected Completion</b>	<b>Completion</b>
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	
20	Send finalized letter and mailing list to Jerry.	Sheri	6/5/19	6/6/19	Complete
21	Send finalized letter to Glenn England to include with upcoming SES (Source Evaluation Society) Newsletter.	Sheri	6/5/19	6/10/19	Complete



Attachment D.

The NELAC Institute's (TNI) Stationary Source Audit Sample (SSAS) program is seeking your input.

As you may be aware, SigmaAldrich has stopped manufacturing Stationary Source Audit Samples. This has caused the EPA to suspend the requirement for Audit Samples to be performed with regulatory compliance testing. ERA has indicated that they will continue to provide Stationary Source Audit Samples as long as there is sufficient demand.

From EPA's website:

"The EPA restructured program requires that two accredited providers be available, and available audit samples must be listed on the EMC website 60 days before audits are required."

From the Air Emission Measurement Center's website (EMC):

"Since there are no longer two providers, the requirement to obtain these audit samples is no longer in effect until such time as another independent AASP has audit samples available for purchase."

The SSAS Committee has gotten feedback from a handful of regulators and testers.

Some regulators have indicated that, while they cannot *require* an audit sample be run with a given testing plan, they intend to strongly encourage the continued use of audit samples.

Some testing firms have indicated that they intend to continue to purchase and run audit samples as a means of generating more defensible data.

The TNI SSAS Committee is a voluntary group which created a Standard for Audit Providers, Provider Accreditors, and Testers and Laboratories, to ensure that the Audit Program was being followed in a manner consistent with generating well documented data of high integrity. The SSAS Committee has no authority over the requirement for audit samples to be run with regulatory compliance testing.

The TNI SSAS Committee is responsible for the following:

1. Managing the Standard which applies to the production of SSAS Audit Samples (Module 1);
2. Managing the Standard which applies to the accreditation of Audit Providers (Module 2); and,
3. Managing the Standard which applies to the use of the Audit Samples by Facilities, Testers, and Laboratories.

TNI supports this program by maintaining the SSAS Database and by providing staff support to the committee. The TNI SSAS Committee is actively working to revise the



consensus standards that control this program, to update acceptance limits, and to address technical issues such as the poor performance for EPA Method 8. In addition, the TNI SSAS Committee has recently been working on creating Standard Operating Procedures to provide a means of expanding the concentration ranges of Audit Samples, particularly at the low end of the concentration range, as well as creating a consensus set of statistical analyses to demonstrate that audit concentration ranges are applicable to the methods.

Since this program started in 2013, 21,730 Audit Sample results have been returned by 114 laboratories, with an average pass rate of 97.6%. Roughly 75% of the Audit Samples were analyzed by ten laboratories, consequently, those ten laboratories may be skewing the pass/fail rate of all Audit Sample results reported.

Until recently, 215 regulators in 47 states, including all EPA regions, participated in the program. At this time, the EPA lacks the resources to manage this program in a manner similar to how TNI is managing the program. It is likely that without the TNI SSAS program, there will be no oversight of the program.

We would like your feedback regarding the TNI SSAS program and whether you feel this program is still a necessary component of what is now a voluntary Source Sampling Audit program. In particular, we would like to know if:

1. You feel that the TNI SSAS Committee has been a viable mechanism for supporting the EPA regulations regarding Audit Samples;
2. You feel that the EPA's audit program adds value to source testing in general;
3. You feel that the cost of the program to the facilities reflects the benefits of the program;
4. You plan on continuing to promote the use of audit samples for regulatory compliance testing projects or testing events; and,
5. You have suggestions for how to improve the TNI SSAS Program.

Please go to the TNI website, under "News", and click on the SSAS Program Survey (<https://nelac-institute.org/content/SSAS/survey.php>) to submit your comments, feedback, answers and concerns. As we are seeking the most feedback we can obtain in this matter, please feel free to forward this message to whomever you feel has an interest in the outcome. **Please respond no later than July 15, 2019.** The feedback will be compiled and discussed during future TNI SSAS Committee meetings.

The TNI SSAS Committee's meetings are open to the public and we value your input. We usually meet by conference call at 2pm Eastern on the third Monday of each month. There will be a public meeting held on Tuesday, August 6, 2019, at the TNI Summer Conference in Jacksonville, Florida. If you would like to participate in the meetings or join the Committee, please contact any member of the Committee (<http://www.nelac-institute.org/committee/ssas>) and we will make sure you get invitations to join the meetings.

Sincerely,

Sheri Heldstab  
Vice Chair, TNI SSAS Committee