

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

June 21, 2021

1. Roll call and approval of minutes:

Chair, Sheri Heldstab, called the TNI SSAS Expert Committee meeting to order by teleconference on June 21, 2021, at 2:00 pm Eastern. Attendance is recorded in Attachment A - there were eight committee members present. Associate Members present: James Haynes.

The May meeting minutes were sent by email and reviewed on Webex. A motion was made by Michael S. to approve the May 17, 2021 minutes as written with a date correction. The motion was seconded by Tom and unanimously approved.

Next month's meeting needs to be rescheduled to July 12, 2021 at 2:45pm Eastern. A number of people could not make a meeting on July 19th.

2. Relationship with PTPEC

Sheri met with the PTPEC and had a small meeting with Jerry Parr, Shawn Kassner and Ilona. It was decided that SSAS does not need to report to the PTPEC. The PTPEC is happy to offer volunteers to help with SSAS table updates as needed. This change will affect SOP 6-100 (Conducting Pilot Studies for New Concentration Ranges and Acceptance Limits for Source Sampling Audit Samples) so the SOP was opened and updated.

Gregg made a motion to accept the removal of PTPEC references in SOP 6-100. The motion was seconded by Mike S and unanimously approved. The SOP will be forwarded to the Policy Committee.

The Committee also reviewed the Charter, but it did not look like any changes needed to be made.

Jerry noted that there is a link in a SSAS table footnote that is broken. It originally referred to the SSAS table. Sheri will look into this.

3. Letter to EPA

Sheri thought it would be good to understand if EPA has any requirement for at least 2 providers for PT samples. Ilona forwarded Michella's address, but she is out of the office through the 29th. Sheri will follow-up on this.

Tom made a motion to approve the letter modified in Attachment C . Michael S. seconded the motion and it was unanimously approved.

Sheri will send Ilona instructions on how to send the letter and she will forward this information to Jerry Parr.

4. New Business.

None.

5. Next Meeting

The next meeting will be July 12, 2021 at 2:45 pm Eastern. Ilona will send out a Webex invitation the day of the meeting. The Committee will review all comments received and look for impact on the Standard update.

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

Sheri adjourned the meeting at 3:25 pm Eastern. (Motion: Tom 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) 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) 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*) Present	Other	ERA (Provider)	brian_milller@waters.com
Patrick Selig (2024*) Present	Other	ANAB (AB/PTPA)	pselig@anab.org

Attachment C

DRAFT LETTER TO EPA

Mr. Peter Tsirigotis,
EPA - Director of the Office of Air Quality Planning and Standards,

June 21, 2021

Re: Stationary Source Audit Program

Dear Mr. Tsirigotis,

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) for the audit program, would like to see the Program reinstated. The continuing barrier to making the Program mandatory again has been the phrase "when commercially available" 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. Precedents for similar language exist within Drinking Water and Wastewater Proficiency Test (PT) programs, which require a PT sample to be run "...if one is available."

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 regulated community is better served when the program is active, as the community has more defensible data on which to base decisions.

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: Steffan Johnson, Ned Shappley, Ray Merrill, SSAS Expert Committee

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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 sent 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. Charter finalized and sent to Policy.

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 (On hold until Standard update.)
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'Neill (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. 6/21/21: Letter finalized and sent to Jerry for final signature and sending.
31	Discuss Committee relationship with PTPEC.		SSAS Committee/PTPEC	1/19/21	TBD	6/21/21		1/19/21: Ilona will add to PTPEC Action Summary too. 6/21/21 call w/Jerry & Shawn Kassner – SSAS not part of PTPEC, but can use PTPEC as a resource.
32	Remove/rewrite footnote 18 from SSAS Table	SSAS Table	SSAS Committee	6/21/21				Jerry noticed this. Link broken and EPA program suspended.

