

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

June 5, 2019

1. Roll call and approval of minutes:

Vice-Chair, Sheri Heldstab, called the TNI SSAS Executive Committee meeting to order by teleconference on June 5, 2019, at 2:00 pm Eastern (special meeting to work on letter to stakeholder). Attendance is recorded in Attachment A – there were 6 committee members present. Associate Members present: Jerry Parr, Stanley Tong, Jim Serne, Mike May, Katie Shonk and Glenn England.

The minutes will be reviewed by email.

2. SSAS Letter to Stakeholders

Sheri reviewed the DRAFT letter she sent out. She also displayed it on Webex. The document was edited as she read through the letter (see Attachment D for final draft of letter.) The edits made it easier to understand and read.

TNI was the only group that set-up a program, but another group could also set up a program. TNI does not write the regulations.

It needs to be clear what stakeholder category the responder is from: Regulator, Tester, Facility, Other, Laboratory. This will be easy to add to an online survey.

The survey will include the questions and the option to add text in a text box after each question.

After discussion, the Committee decided on a July 15th deadline.

Committee members are posted on the Committee's website. Their email addresses are available on the website too.

Jerry thinks it is important to add a comment that ERA is planning to continue providing samples as long as there is a demand. In addition to note about conference call meetings, mention that there will be a meeting in Jacksonville. These additions were made.

Everyone was OK to leave it as the SSAS Committee instead of SSAS Expert Committee.

Jerry was able to send the survey information to William and it looks like it will be operational today. Sheri will send a final copy of the survey mock-up to Jerry after the call.

Katie asked if there should be a spot for open ended questions. Not just Yes or No. Something about how the Committee can improve.

Sheri went through the mailing database and deleted duplicates. She highlighted a few items and asked if anyone had corrections before she deletes them.

SES cannot distribute their mailing list, but they would be happy to pass along the letter to their membership.

The final list is 514 contacts that the Survey and letter will be sent to. Jerry thinks this is a good number and there is no need to research more email addresses.

Tom provided some information on the number of labs and what percentage of the audit samples they run. The top 3 labs do 46%, top 6 do 62% and the top 10 do 74%. This is based on results – not just samples. It is a little biased. The pass rate could drop if all the audit samples were spread over all the labs, not 75% going to the top 10 labs.

Sheri asked about doing a short 2 question survey using a program that gives easy input. Everyone thought it duplicates what is already being done.

Jerry shared the survey on Webex based on the DRAFT letter. William just put it together. The category is a dropdown box. A comment box will be added after each question. Meeting information will also be added.

The survey link will go out and the letter will be sent by Mail Chimp. Sheri will give Jerry the updated letter and the mailing list.

Sheri thinks the Committee should continue its work so that if a second provider becomes available ... everything is ready to go. Module 1 and 3 are so close to being complete and changes needed to Module 2 are minimal. The SOPs are still being worked on. The Committee should continue until the Standard is updated and the SOPs are complete.

Tom thinks the Committee should continue too. When another provider starts up, they need to have all this ready.

Jerry commented that it is not an expensive program to run and they will continue to support it as needed.

3. New Business.

- None

4. Action Items

The action items can be found in Attachment B.

5. Next Meeting

The next meeting will be June 17, 2019 at 2pm Eastern.

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

Sheri adjourned the meeting at 3:31pm Eastern. Motion: Michael S Second: Michael K
Unanimous approval.

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

Attachment B

Action Items – TNI PT Executive 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	No longer necessary.
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	
20	Send finalized letter and mailing list to Jerry.	Sheri	6/5/19	6/6/19	
21	Send finalized letter to Glenn England to include with upcoming SES (Source Evaluation Society) Newsletter.	Sheri	6/5/19	6/10/19	

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