

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

**August 6, 2019**

1. Roll call and approval of minutes:

Chair, Tom Widera, called the TNI SSAS Executive Committee meeting to order by teleconference on August 6, 2019, at 10:35 pm Eastern in Jacksonville, NC. Attendance is recorded in Attachment A – there were 7 committee members present. Associate Members present: None.

2. Update

Tom reviewed the status of SSAS (Attachment D).

Tom provided a summary of the survey (Attachment D).

Where does SSAS go from here??

Tom summarized the slides in Attachment D.

Discussion:

Ed asked why there wasn't a third provider? Tom noted that there is a lot to go through to become accredited. It is not a high margin program. There is a lot of additional paperwork that needs to be done. There is enough work to support three.

Ilona asked if the changes being proposed in the Standard would make a difference to the audit sample providers. Changes discussed in the Standard would help the production side of the audit samples. Tom reviewed some of those changes. They could make bigger batches and it would make it more profitable to be an Audit Sample Provider. Every project has a unique identifier.

Finishing the Standard and the SOPs for adding low level audit samples makes it a better business strategy for another Audit Sample Provider.

Previously, Ned Shapley noted that it would be difficult to change EPA's requirement to one provider.

Tom asked if more should be considered than what the Committee is already working on?

Mike S: Spend more time on how to test the field side. Sheri - A spike into the sampling train itself? Not as rigorous as a gas sample, but it does test some field.

Sheri: If you fail one ... who pays for it? It could have been a sampling or lab issue. Ilona asked if a regular lab audit sample was also sent, it could be argued a fail would be field if the lab passed the regular audit sample. Labs also run a lot of QC with the samples.

It was asked if TNI has talked to other potential providers. Jerry reached out to LGS standards, a PT provider in England accredited to 17043 to see if there was any interest and they declined.

Perhaps the current PT Providers should be approached to see if the changes being proposed in the Standard may change their interest in being an audit sample provider.

Sheri noted that until the SOPs are done ... can we really start the work to get the pilot started to add lower level audit samples?

Gregg noted that we have an open window right now. Compliance is not an issue right now – it is not a mandatory study. Maybe it would be easier to run the pilot study samples.

Michael Klein: If someone runs an audit sample, the results will still be considered for compliance.

Gregg clarified – it should be called a QS sample and not an audit sample for the pilot study.

Tom – if they want to participate in the pilot study that is outside of the audit sample range – it would be a pilot. People could volunteer and it would not need to be sent to the regulator.

Gregg is suggesting that a tester buy the sample and the SOP has ERA sending it directly. This distributes some of the cost. The tester is also sharing in the cost. This will make it take longer to get the data back.

Ilona asked how likely is it that the facility will want to pay for these samples when they think the program may be ending. There was agreement this could be an issue.

It will also take a long time to collect the samples and doing what is in the SOP gets it started sooner.

Gregg is suggesting doing both. Have facilities purchase these QC samples and have ERA send the samples to the lab. The purpose for doing this would be more data and get a feel for what the market is like.

Michael Klein - Do the pilot study quickly and move forward.

Need to look back at the SOP and make sure there are no updates needed.

Everyone is in agreement that the committee should stay intact and finish the standard. Makes it easier and more cost effective for more providers to join in without compromising the effectiveness of the Standard.

The regulators may need to address range expansion and innovation. This is an opportunity right now.

ERA is still working on finding out what states have air accreditation programs. Ilona will talk to Advocacy and see if they have this information.

Why can't we accredit labs to run air instead of the audit samples?

NJ has a program for Air. Mike is interested in keeping the audit samples. He would prefer gas samples as originally planned.

Tom will plan to write a DRAFT letter to submit to the TNI Board. Tom will also give a report on Thursday at the General meeting.

If SSAS goes away ... there wouldn't be a committee to update the the limits.

Jerry didn't want to make the SSAS database a marketing tool and that is why information about which labs have high and low failure rates is not publicly available.

Action items – Attachment D (presentation)

Tom will get in touch with Eric Smith (Chair, PT Program SOP Subcommittee) to find out status of Limit Setting SOP.

CRA is imbedded in the SOP and Tom will talk to Maria Friedman. Get form and Ilona will get it posted.

What is the priority - SOPs or Standard? It was decided the first thing to finish will be the SOP. The Committee could also meet more often to get this done sooner for both.

### 3. New Business.

- None.

### 4. Action Items

The action items can be found in Attachment B.

## 5. Next Meeting

The next meeting will be August 19, 2019 at 2pm Eastern by teleconference. (*Addition: Meeting rescheduled to August 26, 2019.*)

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

Tom adjourned the meeting at 12pm Eastern.

## 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</b>			Ilona.taunton@nelac-institute.org
Ed MacKinnon (2022) <b>Present - phone</b>	Other	TRC Env Corp (Stationary Source Tester)	emackinnon@trcsolutions.com
Gregg O'Neal (2020*) <b>Present - phone</b>	AB	NC DAQ	<a href="mailto:gregg.oneal@ncdenr.gov">gregg.oneal@ncdenr.gov</a>
Katie Gattis (2021) <b>Present -phone</b>	Lab	Element One Inc.	katie.strickland@e1lab.com
Michael Klein (2020*) <b>Present - phone</b>	AB	NJ DEP	michael.klein@dep.nj.gov
Michael Schapira (2021*) <b>Present - phone</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 – Stationary Source Audit Sample Expert 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	


	<b>Action Item</b>	<b>Who</b>	<b>Date Added</b>	<b>Expected Completion</b>	<b>Completion</b>
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	
22	Provide list of states that offer accreditation in Air.	Tom	7/22/19	8/6/19	
23	Contact Advocacy to see if they have a list of states with air accreditation.	Ilona	8/6/19	8/19/19	
24	Prepare DRAFT letter to send to the TNI Board regarding need for continued SSAS activity.	Tom	8/6/19	8/19/19	
25	Get CRA form posted on the TNI website.	Tom/ Ilona	8/6/19	8/19/19	

**Attachment C**

**Backburner / Reminders – Stationary Source Audit Sample Expert Committee**

	<b>Item</b>	<b>Meeting Reference</b>	<b>Comments</b>






## Stationary Source Audit Sample (SSAS) Expert Committee TNI/NEMC 2019 Jacksonville, FL

**Tom Widera – SSAS Chair**  
**Sheri Heldstab – SSAS Vice Chair**  
**Ilona Taunton – SSAS Program Administrator**

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### Agenda

- Introductions
- SSAS Committee Members
- Current Status of the SSAS program
- Results of the SSAS Survey
- Updates to Old Action Items
- SOP Revisions
  - SOP 6-100
  - SOP 6-101


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### SSAS Committee Members

- Ed MacKinnon – TRC Solutions
- Michael Klein – NJDEP
- Mike Schapira – Enthalpy Analytical
- Katie Gattis – Element One
- Tom Widera – ERA, A Waters Company
- Sheri Heldstab – Chester LabNet
- Gregg O’Neal - NCDAQ


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### Current Status of SSAS

- The SSAS Final rule of September 2010 requires that two Audit Sample Providers must be accredited for there to be a viable Audit sample program.
- As of June 2014, there were two accredited Providers, ERA and Sigma Aldrich, and audit samples began to be delivered.
- To date there have been over 20,000 audit results reported with an average of 97% successful results.
- In May 2019, Sigma Aldrich informed their customers they will no longer be providing audit samples.
- That leaves only one accredited audit sample provider, ERA.


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### SSAS Survey

- To try to help the SSAS Committee with how to proceed with the program, a SSAS survey was conducted on the TNI website.
- The survey asked participants to provide feedback
  - Do you feel that the TNI SSAS Committee has been a viable mechanism for supporting the EPA regulations regarding Audit Samples?
  - Do you feel that the EPA’s audit program adds value to source testing in general?
  - Do you feel the cost of the program to the facilities reflects the benefits of the program?
  - Do you plan on continuing to promote the use of audit samples for regulatory compliance testing projects or testing events?


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### SSAS Survey Results


- There were 49 responses received
  - 1 response from a facility
  - 6 responses from laboratories
  - 9 responses from Regulators
  - 31 responses from testers
  - 2 responses from other

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SSAS Survey Results 


- Do you feel that the TNI SSAS Committee has been a viable mechanism for supporting the EPA regulations regarding Audit Samples?
  - 40 Replied Yes
  - 9 Replied No
- Do you feel that the EPA's audit program adds value to source testing in general?
  - 26 Replied Yes
  - 23 Replied No
- Do you feel the cost of the program to the facilities reflects the benefits of the program?
  - 26 Replied Yes
  - 23 Replied No
- Do you plan on continuing to promote the use of audit samples for regulatory compliance testing projects or testing events?
  - 27 Replied Yes
  - 23 Replied No

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SSAS Survey Results 


- The survey asked for comments on the program
- 17 respondents indicated that the audit samples added value to the program.
- 25 respondents indicated that the Audit program only tests the labs.
- 11 respondents indicated that field activities need to be part of the program.
- 5 respondents indicated that new audits would be useful, including PM and gas phase audits.
- 7 respondents indicated that lower audits concentrations would be helpful.
- 9 respondents indicated that the cost of the audit is minimal to the cost of the program.
- However, 20 respondents said the cost is excessive and benefits are minimal.
- 8 respondents indicated that labs are already running PTs so the audit sample is unnecessary.
- 12 respondents indicated to use the PT program to accredit labs for SSAS work. 13 respondents indicated that the EPA needs to change the program in some way such as doing multiple audits per source per ear, use a PT program for labs, or to eliminate the program entirely.

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SSAS Survey Results 


- The survey asked for comments on the program
- 17 respondents indicated that the audit samples added value to the program.
  - It adds another layer of defensibility to the data.
  - It adds another layer of quality control to the process.
  - The audit program legitimizes litigation for all parties involved.
- 25 respondents indicated that the Audit program only tests the labs.
- 11 respondents indicated that field activities need to be part of the program.
  - One comment said that testing the field activity would cause confusion for who is at fault if an audit fails.
- 5 respondents indicated that new audits would be useful, including PM and gas phase audits.
- 7 respondents indicated that lower audits concentrations would be helpful.

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SSAS Survey Results 


- 9 respondents indicated that the cost of the audit is minimal to the cost of the program.
- However, 20 respondents said the cost is excessive and benefits are minimal.
- 8 respondents indicated that labs are already running PTs so the audit sample is unnecessary.
  - The audit sample only tests the lab and since labs are being accredited the cost is not adding value.
- 12 respondents indicated to use the PT program to accredit labs for SSAS work.
- 13 respondents indicated that the EPA needs to change the program in some way such as doing multiple audits per source per ear, use a PT program for labs, or to eliminate the program entirely.

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**WHERE DOES SSAS GO FROM HERE??**

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Future of SSAS 


- There are a number of decisions that need to be made regarding the SSAS program future.
  - Allow the Audit samples to continue on a voluntary basis. Many Regulators have indicated that the Audit provides a line of defensibility of the compliance data. Many have said that they will highly recommend the continued use for the Audit sample.
  - Aggressively pursue a second Audit sample Provider. The privatized program has been in operation for 5 years and another Provider has yet to step forward.
  - Pursue a change to the EPA Final Rule of September 2010 to allow the program to operate with only 1 accredited Provider. EPA has indicated that this may take years to accomplish.

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Future of the SSAS Expert Committee 


- Even though the Audit sample program is currently on hold, the Expert Committee feels it still has work to do.
- There may be a second Provider coming on board sometime, so the program needs to be ready.
- The Committee is currently working on two SOPs to address lowering the concentration range.
  - SOP 6-100: Conducting Pilot Studies for New Concentration Ranges and Acceptance Limits for Source Sampling Audit Samples.
  - SOP 6-101: SSAS Table Management.
- The Committee is also working on revising the 3 SSAS Modules based on experience from operating the Audit sample program.

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Future of the SSAS Expert Committee 


- Volume 1 Module 1: General Requirements for Stationary Source Audit Sample Providers
- Volume 1 Module 2: General Requirements for an Accreditor of Stationary Source Audit Sample Providers
- Volume 1 Module 3: General Requirements for the Participation in the TNI Stationary Source Audit Sample Program.

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Action Item Status 

- Contact Carl and Shawn about equations used for limits. Can they provide wording for the SOP?
  - Tom Discussed with Shawn Kassner about the PTPEC plans to revise the SOP for calculating regression equations. Shawn indicated that they do have plans sometime in the future but are not making revisions currently.
  - This means that SOP 6-100 Section 5.6 will stay consistent with the current protocol.
- Talk to Maria about CRA and get posted on the SSAS website.
  - CRA is the Change Request Form. Currently the CRA is pasted into the SOP. We need to get an electronic copy from Maria Friedman. This action item is in progress.
- Update SOP 6-100 based on review during meeting.
  - Updates on SOP 6-100 are still in progress

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Action Item Status 

- Discuss impact of 40 CFR 60.8 g(2)vii – last sentence with Ned.
  - This section discusses reporting the value of the audit sample to the source, source owner, or representative.
  - This presents an issue of making the certified value public while there are still samples available in the production batch.
  - After discussing this issue with Ned Shappley from EPA, it was decided that providing a unique identifier for each Audit sample would prevent the value from being made public.

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