TNI Stationary Source Audit Sample (SSAS) Expert Committee June 12, 2017 Teleconference Minutes

Attendance:

Tom Widera – Chair ERA (Provider)	Committee member	**Present**
Vacant – Vice Chair		
Andrew Chew EPA (Federal Government)	Committee member	**Present**
Ed MacKinnon TRC Env. Corp. (Stationary Source Tester)	Committee member	**Present**
Gregg O'Neal North Carolina DAQ (State Gov.)	Committee member	**Present**
Katie Gattis Element One, Inc. (Laboratory)	Committee member	**Present**
Michael Klein New Jersey DEP (State Government)	Committee member	**Present**
Mike Hayes Linde (Provider)	Committee member	absent
Paul Meeter Weston Solutions (Stationary Source Tester)	Committee member	absent
Michael Schapira Enthalpy Analytical, LLC (Laboratory)	Committee member	**Present**

Jim Serne TRC Env. Corp. (Stationary Source Tester)	Associate member	**Present**
Stanley Tong EPA Region 9 (Federal Government)	Associate member	**Present**
Tom Maza ME - DEQ (State Government)	Guest	**Present**
Marge Heffernen Alliance Source Testing (Laboratory)	Guest	**Present**
Sheri Heldstab Chester Lab Net	Guest	**Present**
John Buresh Excel Energy	Guest	**Present**

Call to Order

Tom Widera began the meeting at 2:05 EDT. A quorum was present.

Membership

Bob Wyeth updated the committee membership to remove Bob O'Brien and Nishant Bhatambrekar. Bob O'Brien said he will try to find a replacement from his company. Tom will update Katie's last name on the attendance list.

Monthly Meetings

August meeting will be rescheduled to Monday afternoon August 7 to coincide with the TNI conference.
Minutes from March were approved. Minutes from April were made available with Michael Klein's and Mike Schapira's comments. Mike Schapira moved to accept. There were no nay's, 1 abstention (Katie who was absent), all others approved. The minutes were accepted.

Regulator Blanket Approvals

Stan Tong sent email polls to the states regarding blanket approval waiver. He received 14 replies liking blanket approvals, 13 did not like them, and 8 did not reply. Some states would be open to the blanket approval if there is a problem, in order to reduce the approval interval that regulatory agencies were having. Some were concerned they might be pressured to sign the waiver or they may want to revoke the wavier in the following years. Some states like having notice of audit samples. One state specifically wanted to approve lead audits being ordered. One state mentioned 40 CFR 60.8 G2 paragraph 4 states the program will provide the opportunity to comment on the audit sample approval; how does this wavier allow for this?
Michael Klein said states that do not want to give up the right to look at audits will not have to. He feels the waiver should have to be renewed once a year. Gregg O'Neal asked if you signed the waiver, how you would revoke it. Tom Widera said we could put a system in play as simple as sending the provider an email to revoke the waiver. The idea would be to make the process as easy and quick as possible. Regulators would not be bound to the waiver if they changed their minds.
Gregg asked if notices would still be sent to regulators who had signed the blanket waiver or if audit orders would just be filled. Tom said a notice would still be sent but it would not require approval. Stan commented this was a concern brought up by a couple of states. Tom Maza suggested that along with the notice, include a statement *"..if you wish to discontinue your waiver please contact us at…"*. Michael Klein suggested adding "*within 24 hours"* to the statement.
Tom Widera said currently there is a 21-30 day window for sending audit samples. Shipping is based on estimated sampling date for the facility. Therefore, if a regulator says they wish to change an audit sample concentration 4-5 days after the notice is sent, that generally should not be a problem. Gregg asked if ERA could send a notice to regulators 24 hours before shipping audits. Tom will have to speak with his SSAS team about that. Tom stated the regulators we are wanting to sign the waivers are the regulators that never say no to an audit concentration; these are the regulators who will agree to the blanket approval.
Tom will get his SSAS team at ERA to create a letter to send to the regulators. Tom will let the committee comment on the proposal. Hopefully he will have something before the July call.

Significant Figures

The committee needs to decide how and where we want to discuss significant figures in the modules. ERA instruction sheets have been updated to require three significant figures when reporting. Tom is still waiting on ERA internal approval process before these forms are put into effect and he will keep us up to date on when this is approved.
Tom solicited help from labs regarding ERA's Method 8 dilution instructions which call for H_2O_2. Tom received overwhelming feedback that H_2O_2 is not needed in the preparation of this audit sample. This change in ERA's instructions is going through the internal approval process as well. Sheri informed Tom there is also a calculation error for making dilute H_2O_2 in ERA's Method 8 prep instructions.

Audit Sample Requirement

Tom said 40 CFR 60.8 G1 allows for a regulator to waive an audit sample if they do not feel it is necessary. Michael Klein said this option is more if the audit will not be representative of the field sample testing or if multiple sources are tested at the same time. Tom agreed this is grouped in the section discussing multiple sources, but simply says regulators can waive an audit sample.

Updating V1M1

There is a reference in Section 2 and Section 5 to ISO Guide 34, this needs to be updated to ISO 17034.

Section 3: Eventually there will be a TNI glossary of terms and definitions which will encompass all TNI standards; Tom is a member of this committee. Someone asked if there is be a general definition regarding significant figures. Tom said in the PT program there is; however, the SSAS program only states the true value must be to three sig figs and does not discuss reporting to three sig figs.
Section 6: Sheri asked if there was any requirement for providers to verify the true value of an audit in the matrix used by the lab. Tom stated the provider is only required to verify the assigned value of the analyte, not necessarily by method if they can prove their method is equivalent. For instance, titration versus IC for Method 8. Sherry said her company has a problem with multi-metals in impinger solution because they cannot treat it as a sample. Tom agreed but said you should try to treat it as close as possible to a real sample but it is never going to be exactly the same. Sherry asked if ERA dilutes Method 26A audits in 0.1N H_2SO_4 or in water. Tom said ERA dilutes in sulfuric acid. Sherry would like to see this requirement outlined in the module. Tom stated the modules do not go into that level of detail.
In Section 6.4.1 Tom would like to remove the Note about audit samples outside of the concentration range. Everyone agreed this should be removed.
A question was asked about how we are going to expand the concentration range if we do not allow for audits outside the current range. Tom said this would have to be done through pilot studies and the PT program. Gregg asked if we should include a statement about expanding the ranges. Michael Klein said pilot studies and the PT program are both a sound statistical approach. Gregg would like to add a statement to the standard regarding concentration range expansion to ensure that we are allowed to so. Tom stated the standard requires providers to make audits within the concentration range. If we expand that range, the providers must make audits within that range, but we must expand it first. There is not a module about the control of the SSAS table. Tom explained in the PT program, expansion is dealt with through sub-committees who review past data to expand ranges periodically. Gregg is concerned there is no mechanism for expansion. We only review the standards every three years so it would benefit us to figure this out now. The committee was not sure how to expand when the standards were written so it was left open for the committee to determine later. Gregg asked if we need input from the provider accreditor on how to go about expansion. Tom explained the committee has the power to expand and the accreditor has to make his approval based on what guidelines are set by the committee. All requirements in the module are made by the expert committee. Tom asked if we wanted form a sub-committee to discuss expansion or if we want to document it in our standard. Gregg responded that by documenting it in our standard, we will get the conversation going outside of our committee. This can be seen as good and bad but should get more input on the topic. Gregg suggested our standard should simply state our intent to expand and not how we are going to do this. Sherry suggested putting in a statement that the ranges are in the table unless otherwise changed by the governing body. Mike Schapira said we don't want to say there is anywhere else to have values, it's just the table, but the committee can change the table. Gregg added we are supposed to be updating the table periodically. Tom said our charter includes this in our objectives. It is left up to the discretion of the experts on how to do these things.
Gregg made the point that everything is on the table, but we have no way of changing the table at this time. He asked if providers can provide a sample that is not an audit sample. Tom said this is what the Note in section 6.4.1 says and he thinks it should be removed. Tom explained for the provider this is not economical and is not giving us much information towards expanding the standard because we are not doing it on any kind of regular basis.
Ed MacKinnon suggested changing the note to say upon approval of the SSAS committee, audits may be given outside of the concentration ranges listed on the SSAS table. That would give some room for us to change concentrations or do a round robin. Mike Schapira said the note explains how we are going to change the audit table, not the audit sample order. Jim Serne suggested making a separate section stating we can change the table so it is not going to be confused with 6.4.1. Tom said his boss is a member of the PT expert committee; he will ask how they expand their table. Hopefully what they do will be applicable to us. Tom will get information for us and we can discuss this on our next call.
Mike Schapira asked if the section about sig figs was in 6.2. Tom said we definitely want to address the reporting of sig figs in Module 3 for participants because that will be for the laboratories. Someone

suggested maybe we should discuss in more detail in V1M1 how the providers are assigning the true values and acceptable ranges so it agrees with what is happening and is less confusing. Tom suggested it may be better suited in Section 10, Audit Sample Data Analysis. Katie suggested it could also go in Section 8 Reporting Instructions. Section 6 is more about the manufacturing and design of audit samples as opposed to the evaluation of them.

Section 6.3.1 states *"Providers shall prepare audit samples that are compliant with the criteria defined by the SSAS Expert Committee and published in the SSAS Table on the TNI website."* Tom brought up that there are many analytes on the SSAS table that are not required audits because there are not two accredited providers. ERA routinely has people calling for audits that are not available. Tom asked if we should put a comment in the standard in regards to this. Sheri suggested adding a statement *"unless there are not two accredited providers"* to the table. It was Mike Scahpira's understanding testers could still get the audit samples but it was not required unless there were two providers. Sheri stated that the standard reads that providers shall prepare audit samples on the table, meaning if it's on the table then the providers are required to provide it. Sheri suggested rewriting the statement to read *"Audit samples prepared by providers shall be compliant with…"*

Tom said it would be easy to add a statement to the table because there is a link to EPA's website about audit sample availability. It says specifically there must be two accredited providers and then lists which methods and analytes are available. Only the inorganics are available by two providers. The organics are part of the SSAS table but because there are not two accredited providers they are not required. Mike said the original hope was if it was included on the table, the providers would want to make it. Tom said ERA did not consider making these audits because there is a small market for those samples and it is not cost effective. They did not want to go through the investment when they did not think other providers were going to do it. Jim Serne brought up that since the EPA website only includes the inorganics, we do need to change the wording of section 6.3.1. Mike asked if we should remove the organics from our table, or make a note on the table stating they are not required. Michael Klein does not want to remove the analytes because another provider may come in the future and we need to leave the option open. Gregg said there was a lot of simplification written into the SSAS requirements for dioxin audits compared to what EPA had done in the past to make producing them more cost effective. Jim brought us back to the topic of rewording 6.3.1 stating we need to add a comment to the table and we need to reword 6.3.1 to match what is actually happening. Sheri restated her previous suggestion to reword the sentence "*Audit samples prepared by providers shall be compliant with…"* Mike asked if we need a sentence adding providers do not have to make audits to analytes for which there are not two providers. Katie stated all the necessary information is included on the table if people will read through it. There is a footnote on the heading of each page of the SSAS table for 18 and 19 which state there are not audits available for all analytes and to follow the link below for list of required audits. She agreed with Sheri that 6.3.1 needed to be reworded. Mike suggested even *"adding audit samples if available"*. Tom suggested saying "*providers may provide all or a sub-set of audits listed".* Jim said he liked Sheri's suggestion of rewording 6.3.1. Sheri added this is under audit sample analyte, so you want to make sure you are addressing the audit sample itself. We will continue this discussion on the next call.

Next: August 7, 1 pm Eastern
Meeting Adjourned 3:33 pm

Next Minutes Authors
Tom will notify.