TNI Stationary Source Audit Sample (SSAS) Expert Committee Teleconference on June 16, 2015 - Minutes

Attendance:

Tom Widera – Chair ERA (Provider)	Committee member	Present
Charles Simon – Vice Chair VOC Reporting, Inc. (Laboratory)	Committee member	Present
Mike Hayes Linde (Provider)	Committee member	Present
Paul Meeter, Weston Solutions (Stationary Source Tester)	Committee member	Absent
Bob O'Brien Sigma-Aldrich (Provider)	Committee member	Present
Gregg O'Neal North Carolina DAQ (State Government)	Committee member	Present
Michael Schapira Enthalpy (Laboratory)	Committee member	Present
Katie Strickland Element One, Inc. (Laboratory)	Committee member	Present
Stanley Tong EPA Region 9 (Federal Government)	Committee member	Absent
Ed MacKinnon – TRC Environmental Corp (Tester)	Committee member	Present
Danny Wong New Jersey DEP (state Government)	Committee member	Present
Maria Friedman – Test America (Laboratory)	Associate Member	Absent
Michael Klein New Jersey DEP (State Government)	Associate member	Present
Jim Serne TRC Environmental Corp (Stationary Source Tester)	Associate member	Present
Andrew Chew EPA Region 9 (Federal Government)	Guest	Present
Nishant Bhatambrekar GE Power and Water	Guest	Present
Katie Shonk AQC	Guest	Present
Suriya Adhikan Almega Environmental	Guest	Present
Tom Maza State of Michigan	Guest	Present
Brandy Hughes Alliance Source Testing	Guest	Present

Tom Widera called this meeting to order at 14:07 HRS ET. There was a quorum present.

Double-checked receipt of documents to be reviewed in this meeting. All present confirmed receipt of documents. Tom reminded us of the assignment of taking the meeting minutes. He and William have been having issues getting the recordings of the minutes. Hopefully that will be taken care of from this point on. Katie Strickland will be taking minutes for this call.

Tom Widera asked if everyone was ok with having the next SSAS call during the TNI meeting. The committee agreed this was fine. Tom is hoping with a room full of people we will be able to get more input on our topics and more interest in our committee.

Tom Widera introduced our two new members--Danny Wong with NJDEP and Ed MacKinnon with TRC.

Tom Widera has spent a lot of time going over the regulator list at ERA trying to narrow down the correct regulators. Tom has added many new regulators to the list. We have discussed in the past sending a letter to the regulators on the list to check if they are the correct contact and also to see if there are back-up contacts. This is needed because the providers are having a difficult time getting responses back from the regulators for the audit requests. Hopefully the list will allow for quicker responses.

Tom Widera asked the committee how many contacts are appropriate for each region. Thus far the list is compiled of all the contacts testers have given ERA as contacts. Should we have all of these people listed or do we want to narrow it down to just a few per region.

Charles Simon explained there are multiple regions in each state and one region will not handle work for other regions. We need to have a contact for each region. Charles has tried to reach out to several of these regulators and has gotten no response. Charles assumes these offices do not recognize the SSAS committee or want to push the responsibility to someone else.

Charles asked Tom how he compiled the list. Tom responded the list was built from ERA's database. He has not gotten a list from Sigma-Aldrich. Tom explained part of ERA's audit sample request form is to designate a regulator. As you can see form the list, some states have up to 10 regions and we want to have contacts for each of those regions. However, for instance, Toledo has seven contacts listed. Do we want to keep that many contacts or only 2-3.

Michael Klein explained that each state is different. Some states may have each region be the contact regulator for SSAS. But some states have a designated person, like New Jersey where all SASS goes through him.

Charles said he was looking at Ohio and each region is a little chunk of the state. He deals with Ohio a lot, and this opposes to NJ where everything goes through one office. Ohio wants everything to go through the appropriate district office. Florida is another state like this. Charles explained more in depth how Florida regions work.

Tom noticed when ERA received a list of agencies that registered to get a regulator ID and some of them look like they could be repeats. For instance there are two EPA's in Tampa that could be duplicates. Without knowing the specific regions and how they operate Tom was unable to determine if these were duplicates. He would rather have too many on the list and remove the duplicates than miss someone that should have been included.

Tom asked if the information he included on the list is what we wanted to include. Charles suggested that the addresses are not necessary because we are an electronic age and email and phone number are all that is necessary. He thinks the information we have is sufficient.

Tom asked again if we need to set a minimum or maximum on the regulator list. Charles said we should not set any min-max, just include whoever is active. If a regulator contacts you and says I am no longer the SSAS contact, remove them from the list. This way if we send emails to a regulator and don't get a response, we have a back-up regulator to try and contact. Charles said we need to be as flexible as possible if things are going to run as smoothly as possible.

Gregg O'Neal said he sees names on the list for North Carolina on the list that should not be because they are only regional contacts. North Carolina is handling SSAS all through the central office. There are a couple of names that should be on the list from central but none of the regional or local contacts should be handling SSAS.

Charles suggested sending an email to everyone on the list and explained they are on the list, what the list is and asking if they are the correct person to be one the list and if anyone else should be on the list as well.

Gregg said he thought the only people that should be on the list are the people that are actually approving audit sample concentrations. Charles agreed. At some point, this list will change, and Charles thinks we should send out this letter twice a year to ensure the list stays up to date. Gregg and Tom agreed. Charles asked if this is something we could do soon by combining Tom and Bob's list.

Tom explained he wants to get the list correct as soon as possible because this is one of the biggest issues ERA is facing with the program. He would like to be able to help testers get audits quickly when needed. The names he has on the list are names given by testers and he doesn't know if they are the appropriate person. Even though the standard says order an audit 21-30 days prior to a testing event, we all know that doesn't always happen. ERA would like to be able to accommodate these situations. Having the correct name and contact information, would help facilitate this. Also, there are several agencies that do not want to deal with the SSAS program and are simply letting the 15 day period expire and ERA is sending out whatever concentration was initially requested by the tester.

Gregg suggested we set up the form to screen out some of the names we know are a dead end. Tom would like if we know anyone on the list who should not be there than we can go ahead and remove them without having to contact them.

Mike Schapira asked if the regulators are allowed to have access to the database, wouldn't their name be in the system. Therefore, we shouldn't remove their name from the list. Also, he believes it would be better to send the email to everyone we have thus far. This way even if the correct person does not respond, maybe one of the other contacts will. Michael Klein thinks this would cause confusion because you may get more than one response. The program requires the tester to identify the correct regulator and if they don't then it's the tester/facility's fault. He thinks we should send out one email and then maybe a follow up to others if there is no response.

Tom Maza thinks we should have a primary person for each state. So the request would go through them then funnel to the appropriate person for that particular test.

Gregg said North Carolina is doing something similar.

Mike Schapira asked again if all the regulators were supposed to have their name in the system to have access to the database. Tom explained we are not talking about removing them from the database, but from the list of contacts for audit approval. We have so many contacts on the list because we don't know if the names given by the testers are correct.

Jim Serne pointed out that Air Hygiene is not a regulatory agency but a testing firm and they are on the list. Tom said it's interesting because they have a regulator ID, but he will work on removing them from the list. Bob said he could get Tom Sigma's list of contacts.

Gregg pointed out a few more examples of contacts for North Carolina that should not be on the list. Tom said there are duplicates on the list that have regulator ID's but no contact information.

Tom asked the regulators to email him any additions or subtractions to the list they know of.

Jim and Gregg discussed a few more NC additions and subtractions.

Tom asked again if the committee was ok with a simple email being sent about the list and explained they are on the list, what the list is and asking if they are the correct person to be one the list and if anyone else should be on the list as well. Gregg said specify that it is only those who are actively approving audit sample concentrations. Gregg asked if there was not already something written regarding the regulator list. He suggested William might have access to this. Tom said he has been having difficulty getting information from him.

Tom asked if the regulators could mention it on the next regulator call in July. Gregg said they could do that. Gregg asked if this is something we could send out on the next EAP email. Michael Klein said this could be helpful.

Michael Klein said that this program has been around for a few years now so you would think the people who are active are probably the people who are going to be active. People should know what is going on with the program by now. Gregg said based on the list, it looks like testers are not sure who they should be putting down. Gregg said someone could get this information to Candace and we could discuss it on the next call to help clean up the list. Michael Klein offered to do this. The next conference call was right around July 4 so attendance may be low, but they could follow up again in August. Tom will combine his and Bob's list and then give it to Michael Klein to send to Candace. Bob will have it to Tom in a couple of days.

SSAS committee will have a meeting 07/15/15 2-5pm CT at the TNI meeting. Tom requested anyone who will be there to let him know. Several members stated they will be present.

Gregg O'Neal left the call at 1450.

Tom will have a special access code and call in for us on the next call. Tom wants to gather more info on several topics to discuss that day. We have to approve the Accreditor modual (V1M2) and we also need to discuss the Method 8 Sulfuric acid audit issue.

Tom sent everyone an update to the central database. This is updated as of 05/28/2015.

Charles questioned if fluoride samples had HF listed and asked if the providers were actually putting HF in the audit samples. Tom said they are using sodium fluoride. Charles went on to explain that glass ampules contain aluminum which could react with fluoride. Tom explained ERA has done long term studies and have no issues with this. The ampules are Borosilicate glass and would not react with the fluoride. Tom said most of the fluoride audits are analyzed by IC and the failure rate is most likely due to co-elution of the fluoride peak with the water dip; which could be caused by a dirty column or incorrect eluent.

The pass rates for most of the analytes are above 90%. Silver on filter and HF in ampule both have low submittals which skew the pass rate slightly. But for all those with high submittals have great pass rates, with the exception of sulfuric acid with an 80% pass rate from 177 submittals.

Mike Schapira had started gathering some information on this but has been having difficulties getting data from the database from William.

Tom started compiling ERA's data on sulfuric acid audits. He was looking for some correlation for the higher failure rates. He noted the lower the concentration, the higher the failure rate. He also reached out to ERA's customers that run these audits routinely for information regarding how these samples are analyzed. Tom asked if the concentration range is appropriate for this. He also stated that the method really specifies using titration for analysis but he is seeing a lot of submittals from IC. Is the problem technology based related or concentration related. Tom does not have enough response to really summarize things, but it looks like to some degree we have a concentration issue.

Charles reminded us that Roy mentioned about dirty IC columns and incorrect integration of peaks and asked if that could be the issue for some of the failures. Mike Schapira said we could always go back and look at the chromatograms, but from his analytical experience when he reviews chromatograms they are generally in good condition, but we could always investigate further. He also thinks it's very logical that the lower the concentration the higher the failure rate. We assumed the low end of the range was within acceptable limits but maybe we need to take a second look at it. Michael Klein asked if these were failing high or low. Tom had not looked enough into it to say definitely. But not knowing the technology used makes this a little more difficult.

Mike Schapira stated it would be nice to receive the audit sample as a whole rather than something we have to dilute 200 times, because we rarely have to dilute the field samples by that much.

Jim Serne asked does the lower limit show the split criteria for the concentration range (low end has wider criteria). Tom said this is correct and asked if the split in the range is at the right spot. We need to know how much the failures are missed by to help determine these. He noted that concentration greater than 50mg have a much better pass rate.

Tom said some of the people he has spoken to privately have reiterated the color change is much more difficult to see at the lower range. Tom asked does this pose the same issue in IC. Katie Strickland said no, IC does not look at color change. Mike Schapira agreed there is no human error in IC. Tom is interested to see when we get the technology information to see where we use IC and where we use titration. Is the failure rate really higher in titration? Percentage wise 65%

of the samples were run by 6 labs. Those 6 labs have a pass rate of 91% and the other labs have a combine pass rate of 65%.

Michael Klein said the audits are doing what they were meant to do by showing tests that aren't being analyzed properly. Tom asked if the test should only be performed by the labs who can pass it. Mike Schapira said TNI is staying away from this but leaving the information for regulators to see so they can steer testers towards the labs with the higher pass rates. It is also a possible law suit. Michael Klein said a regulator can't say what lab to use. Ideally, the regulator could say the test must be redone because you failed the audit and the tester would use a different lab and eventually the market would take care of itself.

Jim Serne said that is why the testers wanted to know the pass/fail rate so they could better choose labs for specific test. Mike Schapira agreed that some labs were hoping testers would do this too and gain more clients because of it. Katie Strickland asked wouldn't it make sense to use NELAP certified labs who have to perform PT samples regularly to remain certified in these methods. Tom agrees but said there is no regulation saying NELAC labs have to perform PT samples and some states don't push that agenda.

Michael Klein asked if ERA's PT data for sulfuric acid showed the same correlation as SSAS data. Tom said from a concentration stand point yes.

Someone asked if the summary of PT results is a mix of titration and IC. Tom said yes, and about 80% of the data points he has logged thus far are titration.

Tom said a large amount of audit requests for sulfuric acid are at the low end of the concentration range. Michael Klein said the range is not even close to the detection limit of the method. We need to get an appropriate audit sample at this low end because that is where the issue lies.

Mike Schapira said we need to get the list of the labs and ask them what we did because we can guess all we want but until we get the answers we aren't solving anything. Tom asked if anyone else knows how to get the information on the projects other than Williams because we are having trouble getting information from him. Katie Strickland asked if the list Tom complied was all of the SSAS projects for ERA. Tom said yes. Katie asked if Bob could do the same for Sigma and have that be the list. Bob agreed he could do this.

Mike Schapira agreed if they could get this information to him it would be sufficient.

Someone suggested that labs probably use the same technology always. Tom explained that from the labs he had contacted this was not the case. It is project specific depending on client request, concentration or other reasons.

Mike Schapira will cut and paste from the lists he receives from Tom and Bob and send to individual labs. The spreadsheet and the letter to send to the labs are pretty complete.

Tom would like to continue the Method 8 discussion on the next call. Also, now that the committee is pretty established, are we focused the right problems. Mike Schapira said we are definitely working on one of the issues right now (method 8) and also need to work towards adding new elements and ranges. Charles asked if on the next call if we can bring up introducing gaseous audit samples. Tom also wants to look at the concentration ranges for various analytes.

Next call will be July 15, 2015 2-5pm CT.
Charles moved we adjourn the meeting. Katie Strickland second. All agreed.