

TNI Stationary Source Audit Sample Expert Committee Conference Call Summary October 20, 2008

Participants: Maria Friedman (Test America), Richard Swartz (MO DNR), Ray Merrill (ERG), Gregg O'Neal (NCDAQ), Stanley Tong (EPA R9), Mike Miller (NJ – retired), Michael Klein (New Jersey), Shawn Kassner (ERA), Jack Herbert (OR DEQ), Candace Sorrell (EPA), Chuck Wibby (Wibby Env.), Ken Eichelmann (Air Liquide), Jane Wilson (Program Administrator)

Review of October 6th meeting summary

Ray Merrill suggested a change to the notes in reference to determination of the SSA sample concentration. The October 6th meeting summary was approved as amended (Ray M. motion/R. Swartz second).

Chair Updates

Maria Friedman updated the group on some items related to the SSAS standards development effort. She has contacted A2LA about their interest in becoming an SSAS provider accreditor, but has not yet gotten a response. She is also working with Jerry Parr to determine how to make a more public announcement so that other interested provider accreditors could apply. TNI will not immediately have a database available to support the SSAS program, but one could be developed 1-2 years down the road. Carl Kircher will be providing an update on the acceptance limits being developed by the FoPT subcommittee. All individuals who wish to be voting members of the SSAS committee must submit their applications, if they have not yet done so.

Face-to-face Meeting in North Carolina

Maria provided some details on the November 13-14, 2008 meeting in Raleigh, North Carolina. It will be hosted by ERG. Maria is also getting hotel information and will forward that to the committee when available.

Development of Working Draft Standard

Shawn Kassner and Stan Tong forwarded proposed revisions for the group to consider. The group discussed the following points related to the indicated section:

Section 8.2.1 discussion:

- The group discussed whether the facility or the state should be the party that is responsible for ordering the SSA sample. Several of the states noted that for enforcement purposes, it would be desirable to place the ordering responsibility on the facility, but that the states must be in the loop on the ordering process. Some of the legal implications of the new paradigm (private sector, multiple providers, etc.) must be evaluated. Future EPA input will be limited to technical issues and requiring audit samples to be obtained from an accredited provider.

- The standard needs clarification on the timing limitations of contacting the provider regarding the audit sample – it needs to happen prior to shipping of the sample. Also the group discussed the timing required for the provider to send the sample, since sometime the provider is provided with very short notice that a sample is needed.
- Maria asked that those with additional comments about these issues provide their comments to the group by October 24th.

Section 8.2.2 discussion:

- The group discussed item d) regarding the requirement to have the SSA sample analyzed at the same time as the field sample. Is there a need to refer to other parameters such as the calibration method and period, batch, QC, etc.? Review of the data set and report is not always sufficient to determine whether the SSAS and the field sample were analyzed together. It was suggested that the providers could include a set of instructions to reinforce how the SSA and field samples should be analyzed. It is also something that can be addressed in the TNI FSMO standards. There may also be state-specific instructions as well. Shawn Kassner will propose changes to this section to add reference to the calibration method/period. Other comments will be pooled and looked at offline.

Section 8.2.3 discussion:

- The group discussed whether to keep this section in the standard or whether it was already covered by other sections. Jack Herbert was concerned that the lab could be receiving another sample (such as a separate QC sample) that is similar in value to the SSA sample. No QC samples should be packaged with the SSA sample. Jack will send suggested language to Shawn and Ray for consideration.

Section 8.3 discussion (NOTE: This is for Section 8.4 “Supplemental PT Studies” in the original draft):

- This section can provide follow up for a lab that fails an audit sample. It addresses supplemental samples that may be obtained by labs for QC purposes and to improve lab performance by completing corrective action before redoing an audit sample. The lab shouldn’t fail based on a bad audit sample. It was agreed that corrective action is not applicable to this model.

Section 9.0 discussion:

- The group discussed the reporting structure. It was proposed that the labs report their data to the state, who determines pass/fail, and then the data is released to the provider. Shawn noted that provider either give data reporting sheets to their clients or allow for on-line input of data – the provider needs to receive the data in a consistent format. Shawn suggested the group consider whether the lab should be provided with more information than a fail – high or fail-low result. The lab

can't receive the same sample again, so there is an opportunity to improve lab performance by providing them with more information.

Maria asked that any additional comments on these sections be provided by Friday October 24th. Jane will update the draft based on today's discussion and provide to the group for use in off-line discussions. Next meeting is scheduled for October 31, 2008 3:00 pm EDT.