TNI Stationary Source Audit Sample Expert Committee Teleconference January 24, 2011

Attendance:

Maria Friedman, Chair	Committee member	present
Michael Klein	Committee member	absent
Gregg O'Neal	Committee member	present
Michael Schapira	Committee member	present
Jim Serne	Committee member	present
Candace Sorrell	Committee member	absent
Richard Swartz, Vice-chair	Committee member	present
Stanley Tong	Committee member	present
Mike Hayes	Committee member	present
Jane Wilson	Program Administrator	absent
Shawn Kassner	Associate member	absent
Mike Miller	Associate member	absent
Ty Garber	Associate member	absent
William Mills	Associate member	absent
William Daystrom	Guest	present
Frank Jarke	Guest	present

1) Double-check of documents to be referenced in this teleconference

All on the call confirmed they received the documents for discussion via Maria's 1/21/2011 e-mail and Jane's 1/23/2011 e-mail containing the 1/10/2011 minutes.

2) Review and approve minutes from teleconference on January 10, 2011

Comment from Mike Schapira: Page 2, next to last paragraph, discussing dilution issues. Mike wants to be clear that audit samples are always diluted according to directions from Provider, but samples are not diluted.

Jim recommended striking out two sentences from minutes: "Some clients do not elect to follow the method instructions to avoid contamination issues. Dilutions can also impact detection limits." All agreed.

Jim asked to verify that William was going to create separate worksheets for each method. William verified that was correct.

No other comments. Mike Schapira motioned to approve. Jim seconded. All were in favor.

3) Chair Update

a) Maria has received comments from EPA for V1M1. EPA is still reviewing V1M2 and V1M3. Maria will e-mail to all the EPA comments. Everyone was requested to review prior to the upcoming TNI Forum in Savannah. Committee will divert focus on this review after today. Today's focus is audit sample template, which Regulators have been talking about last week.

- b) EPA also posed questions about the SSAS Table. Maria was asked to provide supporting documentation for how the SSAS Table was developed. SSAS Table subcommittee will also have to provide detailed information on their work. EPA wants to know "how are each acceptance criteria, for each method, obtained?" Maria looked at all methods on the SSAS Table. Some are based on criteria in published method, some do not have criteria in the published method. It was unclear from the documentation from the PT Board where those other method criteria were obtained. Maria contacted PT Board; they do not have direct answers. PT subcommittee chair (at the time the Table was created) was then contacted – all data stored on someone's PC. SSAS Table subcommittee will need to surrender supporting data/calculations to TNI, and these documents will be stored on the TNI website (or database), as determined by the Webmaster. Supporting documentation needs to be in one place so that any inquiries from other parties may be addressed quickly. In the meantime, Maria is waiting for info from Carl Kircher before responding to Candace about SSAS Table. More details going forward.
- c) Agenda for Savannah: Admin tasks (charter, election of chair) and discussion re. EPA comments to V1M1. Maria asked if a presentation re. Final Rule should be added to the agenda; all agreed. Maria will then also e-mail to all the charter and Savannah presentation this week. Maria will make copies of the Standard for attendees at the meeting.

Committee session will be in the morning of Wed, Feb 2, 2011, 8:30-12:00 with ½-hr break. Jane will have teleconference # available and send e-mail instructions. Maria requested everyone to make every effort to attend.

4) Discuss Audit Sample template/form for estimating concentration range (updated format)

Last week, the Regulators met and discussed the template. Validation can wait. Maria requested Regulators to continue to meet, work on the template, and send progress reports.

William updated the template/spreadsheet based on discussion from Regulators.

Richard took the floor at this time and reported that the Regulators addressed questions/topics from the teleconference on 1-10-2011:

a) Emission Limits: Should users enter estimated stack concentration or emission limit? It was decided it should be whatever the user prefers. It is good for the Regulator to know which one was used. They want to know the starting point (from the user's perspective). A checkbox may be used to indicate choice. William asked how the choice would affect calculations since "Estimated Stack Concentration" is not on the template. Richard said it does not affect calculations; it is only a matter of how the number is labeled on the template. William proposed that instead of a checkbox, he will use a drop-down choice between the two labels. Maria wanted to make sure the arrow for the drop-down would show up. William said it would.

b) Sample rate units: Should sample rate units used for calculation be in m³ or ft³? Per Jim, for isokinetic methods, samplers think in terms of ft³; for Method 26, with midget impingers, they might use Liters/min. Per Gregg, user must be able to put in whatever units they want to use, and have the template do the conversion. He suggested making the template a universal fit, if possible. With different tabs for different methods, we can tailor the units per method. William then asked, if there are only 2 variations (m³ or ft³), he can hardcode these units into the template, as already shown in the current template e-mailed to the committee. The template will use whichever value is entered. If both are entered, formulas only use m³ value. If >2 variations are needed, William proposed making one of the tabs in the template a "calculator" tab to do conversions between various units. He wants to avoid complicating things by putting a separate unit converter on every tab. All agreed with that approach.

Maria asked if the sampler can do the calculation themselves (from /hr to /min)? Greg replied they want the template to do the work for them. Jim added he assumed the tester will be filling out the template, and Regulator will review it. Greg proposed that each method tab be set up with the customary units for that method. Then the template will do the conversion from those customary units to m³/hr for calculations. If they want to input different units, they can go to the calculator page to convert to the customary units.

William asked for verification, based on his understanding of these discussions: whatever customary units are used, the template will convert to m³/hr for the purpose of calculations, and whatever output results are given, those units would always be the same for all methods (not varying per method). Richard said that if we are using ft ³/hr, we should keep those units consistent throughout the calculations. William thought that the proposal was that, regardless of units used for input, the template would still do conversion to m³/hr. Greg said we want to make sure users are not making mistakes at the beginning by having to use non-standard units from what they are used to.

Jim added that he researched the methods and found that the methods refer to m³, not ft³, so if we use m³, that would be consistent with the methods. Greg suggested that we let units be entered in m³, and have the template convert back to the customary units (ft³) so the user can see if they entered the right number.

With no firm agreement having been reached, Maria asked Richard to continue discussing the topic of units among the other Regulators and reach a consensus.

c) Final Diluted Concentration Volume: Left as-is for now. Mike Schapira asked if the methods give guidance about expected final volumes. Should there be two boxes to distinguish between sample volume and audit sample expected volume and would Providers make an audit sample to user's desired concentration? Maria said Providers will not customize concentration ranges – they will already have ranges based on the SSAS Table. Regardless of values entered into the template, no one will know what concentration was actually used in the audit sample. Maria asked what if the method does not specify final diluted concentration volume, would that entry in the template be blank? Richard said that if there is an impinger solution not dictated in the method, you would still have a good idea what number/value to use. The number does not have to

be real exact. Maria underscored the importance of documentation – if a number is used that is not in the published method, where did it come from? Jim said the numbers would come from the test method: every test method specifies the volume to put into the impingers. Greg suggested William put a space in the template for a note where the user can write in notes about why they deviated from defaults. All agreed this was important. Mike Schapira suggested renaming "Final Diluted Concentration Volume" to remove the implication for "dilution." Various alternate terms were proposed. The Regulators will discuss among themselves and make a recommendation later.

- d) Validation: No rush at this time. Regulators will discuss later.
- e) Footnotes/link to SSAS Table: William already added a link to the SSAS Table.
- f) Nomenclature: The committee discussed adding a key or definitions of symbols and terms used in the template. This is also a to-do item.
- g) Colors: The template must be readable when printed with a monochrome printer/copier. William will make sure the colors print OK.
- h) Number formatting: On Method 29 and other methods with multiple analytes, the input values can be entered just once since all elements/analytes will use the same values. The template should not make the user repeat data entry for each analyte. William asked if there should be decimal places in calculated values. Greg said to look at the SSAS Table; the output must match what is entered on the SSAS Table.
- i) Entry of name, affiliation, and phone number: William already added these to the template.
- j) Other items: Jim suggested that the method ID be made more prominent on the template so that it will be more obvious for which method is the tab. Greg asked if we were going to put revision number on the template. Maria said the template would be in the SSAS FAQ in the form of a link but committee can discuss this question further at a later time.

End of Agenda Item 4 discussions

Maria asked if the SSAS Table subcommittee members are attending the subcommittee calls. She wanted to ensure that any update made is a collective effort of many and not just one or two members. Jim added that the next subcommittee call will be this Wed, Jan 26, 2011.

Maria also added that the SSAS Central Database subcommittee would have to reconvene soon to work on how to increase # of contacts for the database. She reminded members to attend their meetings as well.

Maria recapped that she will e-mail charter, presentation, and EPA comments to the committee this week, to get ready for the call on Feb 2 (Savannah meeting).

Jim asked when EPA comments for V1M2 and V1M3 may be expected. Maria responded that since the EPA said they will respond up to end of January 2011, we can expect their response then. Everyone will be kept posted.

Next meeting (after Savannah) will be Feb 14, 2011, 2:00 PM EST.

Meeting adjourned at 3:30 PM EST.