TNI Stationary Source Audit Sample Expert Committee Teleconference
November 2, 2009

Participants:
Committee members –
Maria Friedman, Chair
Richard Swartz, Vice Chair
Jack Herbert
Mike Klein
Stan Tong
Gregg O'Neal
Jane Wilson, program administrator

Associate members –
Shawn Kassner
Mike Miller

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

Maria confirmed the documents for today's meeting were emailed earlier on Monday.

2) Review and approval of minutes from teleconference on October 26, 2009

The committee reviewed the draft October 26th minutes. Under item 3c), the minutes were amended to replace "concentration ranges" with "analytes". Stan motioned to accept/Gregg seconded. All were in favor of the motion.

3) Continue discussions re. Guidance Document for Participants – start with item 10 (in the 11-2-2009 revision)

Item 10 How far in advance do I need to order audit samples?

The committee agreed the timing of the audit sample order is an important topic. Shawn noted the standard allows for a 15 day period for regulatory agency review. Shawn thinks most audit samples can be delivered within 48 to 72 hours after the order is finalized. Sometimes the timing will depend on availability of the audit samples. Sometimes the regulatory agency won't need the entire 15 days for review. The guidance document should provide a recommendation of the advance ordering time frame. Typically 21 to 30 days before the sampling event is adequate. Committee members added that the guidance could recommend submitting sufficient information (calculations, etc.) to the regulatory agency to determine the appropriate concentration range before contacting the provider (as part of the testing plan/protocol). It should also recommend that participants contact the regulatory agency for specific guidance prior to submitting an order.

Item 11 Complaints handling

Maria's recommendation was to note the specific sections of the standards that address complaints. It was also suggested that the addition of some specific examples could be helpful.

Item 12 If audit sample results failed acceptance criteria, what constitutes corrective action?

The committee discussed whether corrective action is part of the audit sample program or the regulatory program. There may be many different types of corrective action based on the non-compliance. There could be a calculation error, dilution error, etc. and each state may handle corrective action differently on a case-by-case basis. Corrective action depends on the reason the audit sample failed.

It was not clear whether EPA will be addressing corrective action as it wasn't included in the draft EPA rule.

Item 13 Reference Guidance Document from Gary M. re. determining concentration ranges of audit samples

Committee members shared an update on the EPA guidance document from the monthly QA call preceding the SSASEC teleconference. EPA couldn't say anything about it yet (and may not have started drafting it yet).

Item 14 Chronological step by step on "how to" of the whole audit sample process

The Committee agreed that inclusion of a flow diagram would help users understand the process in a different way.

Item 15 Checklist

A checklist could provide a detailed list of things to do for preparing to order an audit sample, such as determining the concentration range, etc. It could also cover steps such as set up of the test project ID, etc. The checklist can work in conjunction with the flow chart.

Item 16 General guidance on how to setup or name a Stationary Source Test Project ID

The need on the SS Test Project ID is to provide guidance for those that don't already have a naming convention. What information should be captured in that ID? Can the sample be used for more than one test? How will participants track a single ID across multiple tests and projects? The test project ID is one of the pieces of data the provider will require from the facility, but the provider won't generate it. Maria suggested the regulators talk about it off line to determine what

the test project ID should address and provide a recommendation. Multiple audit samples could be under one test project ID. Maria will also ask William for a suggested convention for creating the ID.

Item 17 Which reports are available via the SSAS Central Database and who has access?

Maria suggested that William can provide what is currently available for review on the next call.

Item 18 How to access SSAS Central Database
Same as item 17.

Item 19 Are necessary ancillary equipment available (e.g., cga350, for Methods 25 and 18)?

Committee members suggested guidance is needed on the handling of certain types of audit samples in containers like gas cylinders. The tester requires the appropriate means for getting it out of the cylinder. The tester should use clean equipment for processing the audit sample. How standardized is it in the industry with respect to the regulators and adapters being used? Ancillary equipment can be a source of error if the appropriate equipment is not used. Shawn volunteered to look into this issue.

Item 20 (redundant to Item 13)

Maria will update the notes for the guidance document to reflect today's discussion.

Next meeting will be on Nov 9th 2:00 pm ET.