## TNI Stationary Source Audit Sample Expert Committee Teleconference March 30, 2009

## Committee members present:

Maria Friedman
Ray Merrill
Gregg O'Neal
Stanley Tong
Jack Herbert
Richard Swartz
Michael Klein
Ken Eichelmann
Jim Serne
Jane Wilson (program administrator)

## Associate members present:

Shawn Kassner Mike Miller Yves Tondeur Mike Schapira

## Invited Guests present:

Dan Tholen Frank Jarke

1) Review and approval of minutes from teleconference on March 23, 2009

Jane noted that Ken was added to the attendee list after the draft was distributed. Jack suggested an addition to the Line 18 summary. Motion to approve as amended was made by Stan, seconded by Gregg. All were in favor.

 Brief progress report from SSAS central database subcommittee – Gregg O'Neal

Gregg O'Neal described the work of the sub-committee to date. They have defined the database requirements as a composite of what is currently available through EPA and additional features. The subcommittee has identified the capabilities and reports that are desired, including information about participants, methods, audit results and accepted values, reported measurement results, pass/fail status by analyte, etc. Field data will be aligned with audit materials to provide a feedback loop. Gregg described that the database would send a notice of receipt of data from the provider. Shawn noted this is already a responsibility of the provider in the draft standards. The group discussed whether the database needs to do this. Optionally the database may include a list of equipment being tested, although this is

currently not part of information being collected. The subcommittee is making a list of everything that might be wanted.

Maria asked the subcommittee to provide a written overview so that the SSASEC can more easily address questions about how to include reference to the database in the SSAS standards. The standards should have flexibility so that changes can be made to the database without changing the standard. The committee discussed the relationship between the standard and a potential guidance document related to the database. The subcommittee has started work on a document that could be the basis of the guidance document.

3) Resume review of Provider Accreditor WDS – Line 29 of the WDS public comments spreadsheet

Line 29 – 6.3.3: The comment suggested clarification on what accreditation is required of the referee laboratory. The lab would need to be accredited to the appropriate standard depending on the audit sample in question. Use of referee labs is a very rare occurrence. The lab would have to be acceptable to the provider and other criteria exist that govern the choice of lab by the PA. The committee concluded to leave the section as is.

This concluded review of the Provider Accreditor WDS comments.

Spreadsheet on Dan Tholen's comments:

Dan proposes that the same level of oversight is not needed for the SSAS program as for the TNI PT program and it can be simplified. The provider has oversight of tracking of samples at the lot level. Stan had a question on deletion of the complaint management section. Dan noted this is already covered by ISO requirements that will be used by the Accreditor.

For 6.3.4 b), regulatory agencies need to define what level of oversight is desired for SSAS. Mike Miller explained some of the history around the development of the TNI PT oversight program. What is proposed is a little bit more than A2LA does for other types of programs. The committee agreed that Dan's comments will be adopted.

Tab on Shawn/Ray comments:

Provider WDS, Section 7.1.7: The committee discussed the impact on the analytical lab if the provider analysis of the audit sample is off target. Jack is concerned that when the provider analysis is off by a large amount, it tightens the limit that the analytical lab can be off. Other members didn't think this section has an impact on the analytical laboratories. The Accreditor will check this during the accreditation process. The range for the analytical lab is determined in a different way from that of provider doing homogeneity and

stability testing. The proposal allows the provider to determine a method for demonstrating the value is correct and the audit sample is homogenous, and the Accreditor verifies it. Jim Serne asked for a copy of the SSAS table – Shawn will send it. Everyone was ok with the changes except Jack.

Participants tab, internal comments:

Line 2, 1.2 – The scope will be consistent with other SSAS documents.

Line 3, 4.1.1 c) In other standards, the group changed to "matrix and collection media, as appropriate". The same change will be made here.

Line 4, 4.1.3 – This item needs to be made consistent with a change in the provider document. See Line 51/52 comments to the Provider document. This does not change the requirement, just changing where it is located. Maria proposed to stop review at this point – Maria will look at the provider spreadsheet to clarify the last point.

Maria also asked for email comments to come to a decision on the use of the acronyms SSAS, etc. versus specific terms, e.g., audit sample throughout the SSAS standards.

SES comments are due by April 3 in order to be addressed by SSASEC in developing the VDS documents.

No meeting will be held on April 6 unless resolution of assigned comments cannot be concluded via email. Next meeting of the SSASEC is on April 13, 2:00 pm EDT.