TNI Stationary Source Audit Sample Expert Committee Teleconference
August 17, 2009

Participants:

Committee members:
Maria Friedman
Richard Swartz
Mike Schapira
Stan Tong
Ray Merrill
Jack Herbert
Gregg O'Neal
Jane Wilson, program administrator

Associate members:
Shawn Kassner

Guest:
Frank Jarke

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

Maria confirmed the documents for today's meeting and she also forwarded Jack's proposal on section Participants section 4.3.2.

Minutes from the August 11 San Antonio meeting will be sent as soon as possible.

2) Chair update

With exception of additional review of Providers Appendix A being conducted by Ray, today's teleconference is last opportunity to address comments. Ray's proposed changes to the Appendix will be discussed on August 24th. Maria will update the VDS documents for all the other changes that have been discussed and decided.

Maria reported two potential new members may join the group – Josh from Wibby (full member), and Paul Bergeron from Lousiana (associate member).

On the August 24th teleconference will also continue discussion of the central database. Responsibility for entry of "other" data needs to be assigned.

3) Resume review of comments to VDS; start with Line 12, V1M3 Section 6.0 of the Others tab

The committee discussed Jack's proposal to Participants section 4.3.2. Gregg motioned to accept the proposal/Richard seconded. Mike S. requested the word

‘to” be changed to “for” – Gregg accepted as a friendly amendment. All were in favor of the motion.

Discussion continued with review of comments in the “Other” tab in the spreadsheet.

Line 12, Participants section 6.0

The comment is a recommendation for addition of a time frame for complaint resolution. The proposed 30 days doesn’t seem sufficient as it can be a multi-step process involving multiple participants. 60 to 90 days might be more typical. Current practice in the EPA program is that a replacement audit sample is sent if the issue can’t be resolved very quickly (very rare). A requirement based on having a plan in place to resolve the complaint within a time frame is another option.

Maria suggested some language involving all participants in the development of a resolution plan. Richard noted the current language seems to require the Provider Accreditor and/or the Regulatory Agency to develop the plan. 6.2 has been previously changed so that complaints are addressed by the Provider Accreditor/Regulatory Agency as the final arbiter of both types of complaints. The question is does a time frame need to be added to both 6.1 and 6.2.

Richard proposed 45 days to deal with the Provider and 45 days for the Provider Accreditor/Regulatory Agency to come up with a resolution plan. Shawn suggested no time frame be proposed for the second part as the SSAS program can’t enforce a timeframe on a regulatory agency. Richard proposed to have a 30 day period for the Provider Accreditor/Regulatory Agency to develop a plan, but leave complaint resolution open. Ray seconded. All were in favor of the motion. The addition to 6.3 specifying a 45 day period for Provider resolution and a 30 day period for the Provider Accreditor/Regulatory Agency to develop a resolution plan will be added.

Line 13, Provider Accreditor section 4.3.3 a)

The comment suggests the regulatory agency should address complaints against the Provider Accreditor. It was noted that the regulatory agency cannot address complaints against Provider Accreditor, since they are not involved in the selection and qualification process. Right now, the TNI PT Board will be providing oversight of the SSAS program. The committee agreed that other participants such as facilities, etc, can raise complaints about a Provider Accreditor, but complaints will be directed to the TNI PT Board. Richard motioned to accept that proposed change/Gregg seconded. All were in favor of the motion.

Line 15 thru 18, Provider sections 7.1.6, 7.1.7

The committee discussed the existing requirements for samples versus the alternate limits being suggested by the commenter. Providers are held to a tighter range than the lab. The commenter may not have understood this section (e.g. line 18 the example is wrong, Line 15 – FoPT tables are available to the public). A 10% limit is a less stringent limit than already required by the standard in most cases.

Ray motioned to find the comment not persuasive since the standard already requires tighter limits on the Provider and requires documentation where the Provider cannot be as stringent. Gregg seconded. All were in favor of the motion.

Line 5, Participants section 4.1.1

The comment suggests an editorial change to delete “audit sample request”. Ray moved to accept/Richard seconded. The motion carried.

Line 6, Participants section 4.1.1e)

Richard motioned to accept the comment/Mike S seconded. All were in agreement with the motion.

Line 7, Participants section 4.1.1 g)

Gregg motioned to accept the comment. After further discussion, the regulators agreed it could be either “estimated” or “proposed” stack concentrations. Gregg amended his motion to include the use of both terms/Jack seconded. All were in favor of the motion.

Line 10, Participants section 4.4.1

The committee reviewed the suggestion from Jack to further amend this section. Mike S motioned to use the term “appropriate” audit sample instead of “effective”/Gregg seconded. All were in favor of the motion.

Line 11 Participants section 4.4.3

The comment relates to who should receive the stack test results (the providers do not need to receive the stack test results in addition to the audit results). Richard motion to accept/Ray seconded. All were in favor of the motion.

Line 14, Provider Accreditor section 5.3.3

Ray stated he had no ongoing comment regarding this item, so no further discussion was held.

Action items:

- Jack needs to talk to RaeAnn Haynes of Oregon
- Line 3 comment – Gary of EPA is writing a guidance document
- Ray will complete Participants Figure 1 corrections
- Review and discuss Ray's comments on Appendix A
    - Some vocabulary doesn't make sense – no soil, water samples.
    - Clarify the appendix for some audit sample types
    - Repeatability of analysis technique, not sample repeatability

These action items will be discussed on the next conference call, Monday 24th. Other discussion item is the central database – need to review permissions matrix and "other" data entry and Mike Schapira's issue related to the "container" field.