TNI Stationary Source Audit Sample Expert Committee Meeting Summary – February 23, 2009

Committee members present:

Maria Friedman
Ray Merrill
Gregg O'Neal
Stanley Tong
Jack Herbert
Richard Swartz
Michael Klein

Associate members present:

Shawn Kassner
Gary McAlister

Agenda items discussed:

1. Review of Februrary 9, 2009 meeting summary
The minutes were approved as written; Stan motioned, Gregg seconded.

2. Change in frequency of committee teleconference
Maria suggested we meet weekly (instead of twice a month) in order to have a voting draft standard posted on the TNI website by 4/15/09. The spreadsheet we are currently working from only includes public comments, and does not include comments from the committee which we also need to address. Meeting times will be Mondays 2pm Eastern, except the 1st Monday of the month, when we will meet at 3pm Eastern (e.g., 3/2/09). It was agreed to meet weekly (with 7 meetings left before 4/15) instead of bi-weekly (with only 3 meetings left before 4/15).

ACTION: **Maria** will check with Jane on the call-in number and access code.

3. Election of Vice-chair
A vice-chair is needed to facilitate the meeting when Maria is unavailable. Richard Swartz was nominated; Stan seconded the motion, nobody opposed.
Richard was elected vice-chair.

4. Comments to Provider VDS

a. Line 34 – 7.1.2 Agreed to delete USP - Gary confirmed US Pharmacopeia is not referenced in EPA air stack test methods.

b. Line 35 – 7.1.6 – The verification/stability limits are difficult or not possible to meet for certain analytes. There was agreement that the

current way of artificially setting the acceptance limits needs to be amended but should probably be done on a case by case basis. Some methods, like Method 8, have a lot of historical data and laboratories can achieve within 5% of the limit. There needs to be some guidance given to Providers so they can achieve some sort of quality measure and there needs to be a minimum repeatability standard with input from the regulators. Provider may verify a sample with a more accurate means (or method) than a laboratory uses to analyze the audit sample (e.g., Method 6 using ion chromatography vs. titration).

ACTION: Ray and Shawn will check with other Providers on what they can achieve, then regulators will decide what they want. Meet off-line and report back to committee. **Maria** will email Ray/Shawn to give them a deadline.

c. Line 36 - 7.1.10 Acceptance limits set by 40 CFR 60 are unachievable and therefore Providers cannot also achieve verification limit. Laboratories are meeting the SO_2 and NOx limits. We are unsure about HCl limits. Laboratories have trouble meeting Method 18 acceptance limits. The other limits are achievable. Acceptance limits for residues and densities may be too low. Jeff Lowry (ERA) may have EPA's historical performance data.

ACTION – Ray and Shawn to investigate in parallel with section 7.1.6

d. Line 37 – Agreed with comment to renumber as 7.1.12

e. Lines 38 and 39 – 7.1.13 and 7.2.4 replace "SASS" with "manufacturing lot" – Agreed to change. Some discussions on why call it a lot when some samples are made individually. The definition of "lot" will be between the Provider accreditor and the Provider.

f. Line 40 – 7.3.1 delete statement on extending expiration date – Agreed to delete.

g. Line 41 – New 7.3.1.1 add new section on stability testing to be consistent with Volume 3 – Agreed.

h. Lines 42 and 43 - 7.3.2 – add "where appropriate," after "shall" and rephrase section on keeping samples for lot confirmation. – Agreed but put "where appropriate" at beginning of sentence; new wording: "Where appropriate, SSAS providers shall retain samples of SSAS…"

ACTION – Maria to determine which is the highlighted phrase; no phrase was highlighted in the proposed changes/comments cell.

i. Line 44 – 7.3.3 - Remove section - Agreed to remove section.

j. Line 45 – 7.3.6 – Renumber as 7.3.5 – Agreed

k. Lines 46 and 47 – 7.4.2 and 7.4.3 - Insert "SSAS" before "provider" – **SKIPPED**

ACTION – Maria put item for future deliberation; this was an internal (from a committee member) comment: "SSAS" has been removed from terms "SSAS Provider," "SSAS Provider Accreditor," etc. in the Provider VDS but committee members did not remember approving this change.

l. Line 48 – New 7.5 label each sample with a unique identifier. – Agreed

m. Line 49 – Section 8 – Remove title - Agreed

n. Line 50 – 8.1 Renumber as 8.0 – Agreed

o. Line 51 – 8.1.1. Change section – **HOLD** - This section was deleted from the 2/9/09 VDS the committee was reviewing.

ADDITIONAL ACTIONS:

1) **Maria** – to send out a new copy of the Provider VDS (will add back 8.1.1 and "SSAS" to definitions in item k above) and the updated WDS 2-9-09 spreadsheet per the discussion in this teleconference

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2) Continue next meeting at line 51 of WDS.

3) **Everyone** - Look at your action items. Review the remaining comments if you do not have a specific assignment.

Next meeting: 3/2/09 - 3pm Eastern

Meeting adjourned at 3:15 Eastern; Maria motioned, Richard seconded.