

TNI Stationary Source Audit Sample Expert Committee Morning Meeting
Summary in San Antonio on August 11, 2009

Committee members present onsite:

Maria Friedman
Gregg O'Neal
Richard Swartz
Ray Merrill

Committee members present via teleconference:

Michael Klein
Mike Schapira
Jack Herbert
Stanley Tong
Jane Wilson – Program Administrator

Associate member present onsite:

Mike Miller

Guests

Dan Tholen, A2LA
Randy Querry, A2LA
Robin Nelson, TRC
Valgena Respass, Enthalpy
Curtis Wood, ERA
Josh Wyeth, Wibby Environmental
Jerry Parr, TNI
William Daystrom, TNI
Mike Fluornoy, TestAmerica
Scott Evans, Clean Air Engineering

Maria called the meeting to order at approximately 9:10 AM CDT and presented the agenda.

Maria mentioned EPA's proposed rule and indicated that this will affect the SSAS Standards. The SSAS Expert Committee will revise the SSAS Standards or use TNI's TIA process as necessary and as appropriate, based on the final rule issued by EPA.

Maria presented accomplishments to date, and described ongoing tasks. She indicated that comments not addressed prior to finalizing the SSAS Standards will be addressed in future revisions/amendments.

Maria mentioned that EPA will stop providing free audit samples on October 1st, so the SSAS Standards must be ready before then. Additionally, she explained

that the SSAS Expert Committee is also working on a database to serve as central location for audit sample results and other information related to TNI's SSAS Program. A Guidance Document for Participants is also in the plan. Maria sent acknowledgements to all who have worked so hard and are still working to finalize the SSAS Standards.

Jerry Parr asked when the EPA rule will be finalized. Stan explained that, at the earliest, it would be 6 to 8 weeks after the comment period closure on August 5th. It was noted that EPA can still re-open the comment period if they wish to.

Maria asked the Providers present how prepared they are to start providing audit samples by October 1st. Dan Tholen (Provider Accreditor) detailed where they are in their process of getting ready for this new program. He explained the deadline of October 1st is, of course, very tight.

Maria displayed the Provider VDS comments spreadsheet. Copies of VDS spreadsheets were also distributed to the guests. Maria explained that some comments are being set aside until the EPA rule is finalized.

Jerry Parr clarified the purpose of this morning's meeting. He explained the comment period had closed. The SSAS Expert Committee was there to discuss remaining VDS comments not yet addressed.

VDS Discussions

Provider Accreditor

Lines 13, 14, and 15, Sections 4.1, 4.1.2, and 4.1.3, respectively – Jerry Parr indicated he agreed with the current language in the VDS: SSAS Expert Committee overseeing the SSAS Table and the PT Board overseeing the SSAS Program. Curtis Wood also agreed that there is expertise in the committee to oversee the Table. Dan Tholen suggested to have one or two committee members join the PT Board. Jerry Parr disagreed and suggested to wait until TNI has resolved this concern re. organizational structure. Jerry noted that the committee should propose what it feels is best for the SSAS Standards. Mike Miller indicated that the committee can establish a subcommittee to work on the Table. All agreed to not change current language in this section. Gregg motioned to reject the comment and consider it non-persuasive; Richard seconded; motion carried.

Participants

Line 13, Section 2.0 – It was mentioned that GD-42 has already been removed from the VDS. Gregg motioned to add reference for ISO/IEC 17025; Mike Schapira seconded; motion carried.

Line 27, Figure 1 – The figure is already adequately drawn to address the scenario when a Stationary Source Tester may also be the Laboratory. The dotted lines in the Figure already account for this scenario. The legends also clarify the commenter’s question. It was noted that this scenario could be further explained or pointed out in the Participants Guidance Document to be written. Gregg motioned that comment is non-persuasive; Richard seconded; motion carried.

Line 32, Section 4.0 – Section 4.5 directs the reader to the Provider VDS. Need to understand the total picture of where they fit in. Providers’ interactions are included, but not their responsibilities. Section 4.0 was reworded to simplify the reference to the Participants. Suggestion to just refer to roles of Participants, rather than including requirements. Section title was amended to “Role of Participants.” Juggle order of the sentences to refer to Figure 1 first. Richard motioned to accept amendments; Gregg seconded; motion carried.

Break from 10:00 - 10:30 AM CDT

When meeting resumed, Randy Querry provided overview of anticipated costs for accreditation of a Provider: \$2,000 application fee, \$5,000 yearly fee, approximately \$6,500 for on-site assessment. On-going monitoring cost may be similar to the on-site assessment cost but unsure at this time. Travel expenses will be added to on-site assessment costs. Some costs might get spread across Providers or can be built into the annual fee, after costs are better identified. Scope expansion for an already accredited PT Provider would probably cost less.

To continue discussion re. costs, Maria mentioned that there is a pending action item for Ray to propose amendments to Appendix A in the Provider VDS to avoid undue cost burden to Participants. Ray explained that Providers are constrained by the requirement to only provide a specific sample to a Laboratory one time. Coupled with the homogeneity requirements, there can be a lot of costs to provide a single sample. Ray proposed some amended language to Appendix A. Dan Tholen cautioned to not confuse reproducibility with homogeneity testing. It was also noted the Appendix A is a guidance procedure. Ray motioned that Dan and he will work together re. the amendments to increase affordability for Providers and that proposal will be presented in next week’s teleconference; Jack seconded, motion carried.

VDS Discussions (continued)

Participants

Lines 11 and 12, add new Section 1.4 – Comment proposes to add new section about program development. Since SSAS Program oversight is currently assigned to the PT Board, the administrative details of the oversight don’t need

to be captured in the SSAS Standards. Richard motioned to consider comment non-persuasive; Gregg seconded; motion carried.

Provider

Line 36, add new Section 6.3.5 – The SSAS VDS already assigned responsibility for oversight of the SSAS Table to the SSAS Expert Committee. To allow for flexibility, the specifics of the committee's oversight plan for the SSAS Table do not have to be defined in the SSAS Standards. The committee can form a subcommittee, as needed, to address details. Richard motioned to consider comment non-persuasive; Ray seconded; motion carried.

Line 52, Section 11.2 – Note that there were conflicting notes recorded re. the discussion on this comment:

Jane's notes: Lab concern about having to retest another audit sample when there is a failure due to interferences not present in the stack sample. Regulator decision as to the basis of the failure. Some states have regulations that don't allow for retesting of the original sample or have to retest all samples, not just the audit samples. If corrective action is needed, it gets discussed among the impacted Participants. If the actual value has been released, the sample cannot be reanalyzed as an audit sample. Workaround would be to first issue as pass/fail and then provide actual value later. Jack moved to table/Mike S. second. All in favor of the motion. Tabled for Aug 17 discussion.

Richard's notes: There was some discussion regarding this comment. After discussion, Jack moved to table the comment, Mike second, motion carried. Maria indicated that all who want to must be prepared to discuss at our next meeting on Monday.

Maria's notes: If another audit sample is required, as determined by the Regulatory Agency, then another audit sample must be purchased. Since the Regulatory Agency determines the final acceptance of a Facility's stationary source test results, any exceptions to the Standards requirement are outside the scope of the SSAS Standards. Jack moved; Mike S. seconded.

Others tab

Participant VDS, Line 4, Figure 1 – Terms used will be amended to match the rest of the SSAS Standards for consistency. Mike Schapira motioned to accept amendments; Stan seconded; motion carried.

Participant VDS, Line 8, Section 4.2.5 – Comment indicated there was confusion between the terms "audit sample results" and "source test results." Ray motioned to delete the section, per commenter's suggestion; Gregg seconded; all in favor except for Jack; motion carried.

Participant VDS, Line 9, Section 4.3.2 – Intent was to have the audit samples shipped together at the same time with the source samples. Confusing the field blank with the audit samples. Scott Evans discussed that field blanks should be used to audit cleanliness of field work. In some cases, want to audit as much of the test process as possible. Regulators can audit at the test site if possible. It's method-specific. Oversight and tracking type issue as well. Restricts some flexibility in the program, that we could delete. Facility's responsibility to get it to the right place and to take care of it. Needs to say something about the audit samples being at the field sampling site. Ray suggested to add to the end of the sentence, "unless otherwise authorized by the Regulatory Agency." Michael Klein motion to accept revised language; Ray seconded; motion carried.

Jack has further suggestion to this section but was requested to submit suggestion via email for the next teleconference on Aug 17th.

Morning session was adjourned at approximately 12:02 PM CDT.

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Mike Schapira
Jack Herbert
Jane Wilson – Program Administrator

Associate member present onsite:

Mike Miller
Shawn Kassner

Guests

Dan Tholen, A2LA
Randy Querry, A2LA
Robin Nelson, TRC
Valgena Respass, Enthalpy
Josh Wyeth, Wibby Environmental
Ilona Taunton, TNI
William Daystrom, TNI

Maria opened the afternoon meeting at about 1:35 PM CDT.

The first order in this session was the approval of the minutes from the Committee's August 3rd and July 30th teleconferences: .

Aug 3rd minutes – Mike Schapira motioned to accept minutes as written; Richard seconded; motion carried.

July 30th minutes – Gregg motioned to accept minutes as written; Mike Schapira seconded; motion carried.

After the minutes were approved, William Daystrom assumed the podium to deliver a presentation on the progress that had been made on the SSAS Central Database. He briefly summarized how the EPA database functioned in a "closed-loop" environment wherein the database recorded audit sample data from the time they were ordered from a single-source Provider to the time results were entered and pass/fail evaluations displayed. He then pointed out how the SSAS Central Database would collect information from multiple Providers so that

audit sample performance information could be reviewed in a single location. Built and supported by TNI, the SSAS Central Database was designed around a philosophy of accessibility, convenience, and security: accessible, in that the database would be used entirely over the Internet; convenient, in that processes would be made as simple as possible to encourage use; and secure, with provisions built-in to protect data confidentiality.

William then outlined a proposed series of fields to be submitted by Providers via Electronic Data Deliverables (EDDs). He described these as "proposed basic data" fields in that they were defined in the VDS as required to be submitted by Providers. However, there had earlier been expressed by members of the Committee a desire for certain additional data to be collected in the SSAS Central Database. William summarized these fields under the heading "proposed supplemental data." Supplemental data would be entered manually via a web form.

The presentation included a discussion of proposed access levels -- which are ways of determining the extent and variety of information available to be viewed by different categories of Participants. The proposal included full access to all data by Regulators and Provider Accreditors, and access for other Participants limited to data with which they had direct involvement (e.g., Laboratories would access their own results, Facilities would access their own audit samples, etc.).

William concluded his presentation by discussing the schedule under which the SSAS Central Database will be developed. Owing to the short time available for implementation, he plans to continue work on the system and begin test trials with example data in mid September 2009, with full operation by October 1, 2009.

Following William's presentation, a lively discussion of key points of the SSAS Central Database began.

Ilona asked whether audit trails would be available that include reasons for changes made in the database. William responded that there are already fields where Providers and Regulators can add comments. Ilona suggested use of a drop-down menu.

In regard to method IDs, Maria suggested use of the method codes already setup in TNI's National Database. William added that even if method codes are used, he will enable search using method descriptions for easier queries.

Break from 3:00 – 3:30 PM CDT

When meeting resumed, Maria proposed the concept of basic (or Provider) data and supplemental (or Other) data, for the SSAS Central Database. Provider data, as mentioned in William's presentation, are those data the Providers have

to submit to the SSAS Central Database via an EDD. At a minimum, this data set must contain all the information defined in the SSAS Standards as part of the evaluation report. As for the Other data, Gregg asked William if this data set can be entered via an EDD. William indicated that another EDD for supplemental data can be created, however, errors can occur more readily. Valgena Respass also asked William if separate EDD data can be downloaded at different times into the SSAS Central Database. William indicated this would really complicate the writing of the program.

Jack seconded Maria's original proposal; motion carried.

Discussion continued from where the committee left off from the teleconference on July 30th: which fields will be included in the Provider data, based on the Table 1 schema previously emailed to the committee on July 29th? In today's meeting, the following fields were added to the Provider data list approved during the July 30th teleconference. Some other fields added were grouped into the Other data:

Provider Data (fields added during the July 30th call are not included in this list)

Evaluation

Units

Provider ID

Regulator ID

Laboratory ID

Facility Name

Facility Address

Regulator Contact Name and E-mail

Provider Comments

Provider Project ID

Provider Accredited Analyte (Yes/No)

Date Evaluation Report Prepared by Provider

Other Data

Start of sampling event

End of sampling event

Collector ID (or Stationary Source Tester ID)

Stationary Source Tester Project ID

Regulator Comments

All were in favor to add the above as grouped.

There were discussions whether to add the field "Container" into the Other data. It was noted that Facilities can send their own containers to Providers, and that use of these containers may cause lab problems, so the container field (or audit sample container type) should be identified. It was decided that there would

need to be a lot more technical information added to the SSAS Standards for this situation to be a possibility. The committee will not discuss the topic at this time.

There was motion to not add the field called "Container" into the Other data. However, Mike Schapira abstained from voting and, hence, there was no majority vote garnered to pass the motion. Motion failed.

Maria thanked everyone for their engaging and energetic participation. Meeting was adjourned at approximately 5:00 PM CDT.

Next committee meeting will be via teleconference on August 17th, 2:00 PM EDT.