

TNI Stationary Source Audit Sample Expert Committee Teleconference
October 18, 2010

Attendance:

Maria Friedman, Chair	Committee member	present
Michael Klein	Committee member	present
Ray Merrill	Committee member	absent
Gregg O'Neal	Committee member	present
Michael Schapira	Committee member	absent
Jim Serne	Committee member	present
Candace Sorrell	Committee member	absent
Richard Swartz, Vice-chair	Committee member	present
Stanley Tong	Committee member	present
Mike Hayes	Committee member	present
Jane Wilson	Program Administrator	present
Shawn Kassner	Associate member	present
Mike Miller	Associate member	absent
Ty Garber	Associate member	absent
William Daystrom	Guest	present

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

All on the call confirmed they received the documents for discussion via Maria's 10/15/2010 e-mail.

- 2) Review and approve minutes from teleconference on October 4, 2010

Maria will draft the minutes for October 4 and circulate for approval via email.

- 3) Continue review of Final Rule vs. TNI SSAS Program

Maria received response from Candace to the SSAS committee questions and Maria added the responses into the spreadsheet. The questions related to Rows 39, 40, 42, 51, and 60 in the spreadsheet.

Row 39 – EPA agreed that TNI can provide a spreadsheet of SSAS providers and available samples for posting on the EPA website. As this information may change relatively quickly, EPA noted it can update the website on a weekly basis. This will be an action item for the Committee after the necessary tentative interim amendments (TIAs) are developed and finalized.

Row 40 – Will come back to this question during the FAQ discussion.

Row 42 – The EPA response is on line 48. Under state's authority, they can request multiple SSAS. EPA has the authority to request this as well. This topic will also be covered under the FAQ discussion.

Row 51 – The EPA response is on lines 58/59. EPA provided clarification of various terms used in the EPA rule. EPA also clarified that new data can be added to the SSAS table as it becomes available.

Row 60 – The EPA response is on line 69. Audit sample providers do not need to conduct their own assessments. It will be done by working together with TNI.

4) Commence review of SSAS FAQ

Maria asked the group to review the proposed changes.

FAQ 3: Maria explained the proposed change is based on the discussion of Row 39 regarding provider information and commercially available samples. Shawn suggested changing the question to “What audit samples are available and who are the accredited providers?” This will cover aspects of the old and new questions. The information will be posted on the EPA website. Jim suggested that the FAQ direct users to the EPA website so that everyone is going to the same place.

FAQ 6: This new question is proposed as a placeholder. It is related to Row 42 and requirements for testing multiple SSAS. Michael K. thought the answer was too long, and it should just direct the user to consult with the regulatory agency. The committee agreed to keep just the first and last sentences. Take out the word “useful” as well as it is not really needed.

FAQ 10: Removal of method 18 references.

Note 3: Maria asked the committee to discuss whether the flowchart needs to be updated to include the submission of pre-test data to regulatory agency? The committee discussed whether the flowchart is clear enough regarding responsibilities in this part of the process. If the regulatory agency wants a different SSAS, they would have to let the participants know. If major changes are needed to the SSAS that has been ordered, the provider is going to have to contact the facility. There seem to be multiple paths of potential communication. Feedback will be going on among the participants, but should the Regulatory Agency take the lead. Depending on the process, the Provider might get word first. The committee discussed whether changes to the decision tree are needed. Jim suggested it might need to be broken up into additional decision boxes – is the number of audits correct, are the concentrations correct, etc. The text in the decision box and Note 3 can also direct user back to the relevant section of the TNI standard (V1M3, section 4.1.1).

Maria asked the committee to review additional items in the spreadsheet.

Row 19: This is already clear in the TNI Std and the EPA rule and doesn't need to be added to the FAQs. It is a common sense interpretation unless questions arise later.

Row 30 – No change needed.

Row 59 – This represents the addition of requirement for providers not to send the same audit sample to a lab twice.

Maria called for a vote on the proposed changes that have been reviewed and discussed. All on call agreed with the changes so TIAs can now be drafted.

Maria will also update the FAQs as discussed for approval.

Shawn provided a SSAS Table Subcommittee update. He noted there were not enough members to vote on their last call.

Row 36 – Shawn said that Row 36 is likely going to be addressed as a Note in the SSAS Table. He will submit a proposal before the next call. Maria will start to prepare TIAs.

The next SSAS meeting will be October 25, 2:00 pm.