TNI Stationary Source Audit Sample Expert Committee Teleconference
October 25, 2010

Attendance:

Maria Friedman, Chair	Committee member	present
Michael Klein	Committee member	absent
Ray Merrill	Committee member	absent
Gregg O'Neal	Committee member	present
Michael Schapira	Committee member	present
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
William Mills	Guest	present
Jeff Lowry	Guest	present

Dr. William Mills III is joining the meeting as a guest today. Dr. Mills is a NELAC assessor and wanted to learn more about the developing TNI SSAS program.

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 10/22/2010 e-mail. The minutes were emailed by Jane on 10/25/2010.

2) Review and approve minutes from teleconference on October 18, 2010

The minutes from October 4, 2010 were approved via email after the previous meeting.

Stan offered some editorial corrections to the October 18, 2010 minutes. Gregg motioned to accept the minutes as amended and Stan seconded. All were in support of the motion.

3) Review revised SSAS FAQ

Maria asked the committee to review the changes to the FAQs document (changes noted in red text, dated 10-22-10). FAQs 3, 7, and 11, and Note 3 were amended per previous discussion. The flowchart was not changed.

Jim asked if there is a mechanism to add to the FAQs in the future. Jane noted that the committee has the discretion to update the FAQs in the future based on new questions that may arise during program implementation, etc. There is a separate TNI mechanism for requesting interpretations to specific requirements of the SSAS standards.

Richard motioned to accept the revised FAQs and Jim seconded. All were in favor of the motion.

4)   Review Row 36 of the Final Rule vs. TNI SSAS Program comparison spreadsheet

Maria explained that a written proposal has not yet been put forth by the SSAS Table subcommittee regarding the incorporation of this EPA requirement in Row 36. Shawn explained the subcommittee has agreed it should be added to the SSAS table, but not on how exactly to do it. Shawn and Jeff Lowry are working on proposed language.

Maria asked if the committee wanted to consider adding this EPA requirement to the V1M1 section 6.3.3, since that was the action taken for Row 37, and the two topics are similar. Shawn recommended doing the reverse – adding the Row 37 requirement to the SSAS table rather than adding it to the standard. The two issues are related and should be dealt with in similar fashion. Gregg agreed it would be more desirable to add the requirements to the SSAS table so that it is easier for TNI to make changes if the CFR changes in the future.

Maria asked whether the committee wants to talk about the issue now or wait until next week when the subcommittee may have a proposal. The committee agreed to discuss the topic further.

Maria asked the committee for further discussion on including the Row 37 response in the SSAS table rather than in the standard. Gregg explained that most of the notes on sample matrices, etc. are in the SSAS Table, not in the standard. When discussed by the subcommittee, it was agreed that it was cleaner to maintain the requirement in the table so that the consensus process is not needed to update it. Locating the requirement in the table should not impact the ability of the TNI program to comply with the EPA regulation. Shawn added that by putting it in the SSAS table, innovation would be encouraged among the providers. It would help drive the research needed to create new audit sample technology. Richard asked how EPA would view the statements not being in the standard. Stan thought it would still be considered part of the program since it's in the SSAS table and suggested asking Candace about whether there is flexibility in where the requirement can go. If located in the standard, a lot of other sample matrix information will have to be added to the standard. Shawn said there are similar elements in the TNI PT program and they are not in the standard. Shawn volunteered to call Candace to get feedback about how to incorporate this element. Jim noted that if it goes in the standard, it should go in the provider requirements (V1M1). He supports having the requirement both in the standard and the SSAS table.

Maria asked for a vote on whether the previous committee vote to include the Row 37 response in the TNI standard should be repealed (yes – repeal the decision, no – leave it as is)

Jim – should be in both provider standard and table
Mike H – no
Stan – yes
Richard – no
Gregg – yes

Maria – no
Mike S – should be in both provider standard and table

The committee did not reach clear consensus on the question.

Further discussion noted that SSAS design criteria belong in the table to the extent possible, as suggested by Jeff Lowry. The SSAS table will be as much a part of the TNI program as the standard. The decision should not be based on providing flexibility for providers, etc, but flexibility for TNI as an organization. This is a requirement that EPA has decided and is not naturally part of the consensus nature of the TNI standards process. Shawn will email Candace about the issue and copy Maria and Jane. Maria will try to finish the discussion by email based on Candace's response.

   5)   Review TIAs spreadsheet

Maria noted that proposed TIA #2 will be on hold since it is related to the previous discussion.

A question was raised about TIA format. While TNI does not have a specified format, Jane suggested that the changes also be incorporated into versions of the TNI standards with track changes identifying the TIA content. Maria will prepare the changes to the TNI standards including the editorial changes identified while reviewing the EPA rule. Jane recommended combining TIAs #1 and #4 since they are part of the same issue. Any other comments can be submitted via email to Maria.

Maria has also asked A2LA about status of the provider accreditation program. The committee discussed the anticipated timing of completion of the remaining TNI SSAS program elements. Items needing completion include the TIAs, the SSAS table, as well as EPA review of the program. It will likely be March or April 2011 at the earliest before new audit samples are commercially available.

Next meeting will be Nov 1, 2010. Start time will be 2:30 pm ET to accommodate the EPA meeting preceding the call.