TNI Stationary Source Audit Sample Expert Committee Teleconference
May 10, 2010

Attendance:

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

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

Maria asked Stan for an update on the new EPA rule. The EPA estimate now is signature in mid-June and issuance of the final rule by end of June. Ray added the ERG contract was extended through Sept. but that included wrap up of the existing program.

Maria noted that all documents for this call were sent via email on 5-7-2010. All confirmed receipt of the email.

2) Review and approve minutes from teleconference on May 3, 2010

Maria asked whether steps e and f of the EDD data revision request process should be reversed per William's recommendation. These steps do not required Regulatory Agency approval, so the database change preparation can be done first. Richard and Stan agree.

Richard motioned to approve the minutes/Stan seconded. Those on the phone voted yes.

3) Resume discussion re. SSAS EDD Data Revision Request Form

Maria reviewed the highlighted changes from last week's discussion.

A step-wise procedure was added to the form as per discussion last week. Maria noted the need to reconcile this procedure with the list from the May 3rd minutes. William reviewed how he had consolidated and organized the process steps. Maria will revise and distribute to the committee.

In this draft the word "remove" became "revised". "Justification for removal" should also be changed to "Justification for revision".

Due to lack of quorum at the time of discussion, voting on the EDD Data Revision Request Form will be done by email.

4) Discuss questions from SSAS Table Subcommittee

The committee discussed Shawn's question about new/experimental analytes – will they be added to the SSAS table and if so, how (See Shawn's 5/5 email to Maria). Shawn noted having an experimental value table is against the trend for TNI which is currently phasing this out for PT samples.

Maria talked to Jerry about this. Jerry noted the confusion regarding the experimental table approach as experienced by the PT program. The suggestion is that new analytes should be added according to professional judgment. They can be established with default limits. Jerry also suggested they could be established without acceptance limits although the TNI Standard requires that limits be defined. Without limits, it would not be consistent with the SSAS standards. The committee will determine how to set the limits in such cases.

Ray noted that the subcommittee (with Expert Committee review) has the expertise to add new entries, but these should be flagged as being new with little supporting data. Mike Miller asked whether this would raise a flag for some users (like experimental PTs did). There is no process for treating these values any differently at the moment, but having a footnote implies they are different. Maria noted the standard requires review of the table values twice a year, so values don't have to be flagged individually. Is it a problem that not all the samples will have the same degree of pedigree? In PT, experimental PTs were not for accreditation and labs didn't know why they were paying to run them. Data were supposed to be collected and used to generate the FoPT. Mike Klein noted that he doesn't want to widen the tolerances, and someone may just be performing the methods incorrectly. He indicated that as a regulator, he didn't want new audits footnoted as being different because it could lead to enforceablity problems and challenges from facilities if a re-test is required based on an audit that was flagged as potentially being of a lower quality or questionable tolerance. The other regulators on the call agreed. Gregg added that regulatory agencies can question the results based on how far from the mark they are. Limits set by EPA in some cases failed a lab.

Maria noted the consensus of the group is to add the general footnote to the table. Shawn noted that some of the method 18 data are shaky for establishing limits today. Updating limits on a regular basis doesn't help if no additional data are considered to support it, The final decision belongs to the agency. Shawn noted that the standard requires biennial review, meaning every two year review. For newer analytes, limits could get reviewed more frequently, with further review as data become available. The committee should not create a challenge by implying a different class of limits for some analytes.

The Subcommittee will prepare the table in that fashion for the Expert Committee review and the Expert Committee will accept or reject. Limits will be based on lab data, manufacturer data, regulatory data, testers data, etc. The committee is assuming no limits will be proposed in the EPA rule, but if there are we can't conflict with them. The Subcommittee goal is to get development of the table done by end of May, but it may take until mid-June to complete.

Maria will update the form and send for email approval to the Expert Committee. The Database subcommittee will review the list of contacts that exist already. Maria noted the need to formalize the addition of Mike Hayes to the committee as a voting member.

Next meeting will be May 24th, 2 pm EDT.