

TNI Stationary Source Audit Sample Expert Committee Teleconference
August 3, 2009

Participants:

Committee members:

Maria Friedman
Richard Swartz
Michael Klein
Ray Merrill
Jack Herbert
Jim Serne
Mike Schapira
Gregg O'Neal
Stan Tong
Jane Wilson, program administrator

Associate members:

None

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

Maria emailed documents on July 31 for reference during today's teleconference.

- 2) Brief announcements
 - a) Minutes of the July 27th teleconference were approved during July 30th SSAS Database teleconference.
 - b) Recruitment

Maria noted that potential new members can be directed to the TNI Website for forms to complete (TNI membership and Committee application). Jack noted the lack of TNI organizational experience among most of the SSAS committee members. Maria explained the difficulty in adding new members in the middle of the consensus process. TNI committees normally add new members in January of each year.

- c) Attendance and teleconference at the San Antonio Forum

The committee confirmed who would be in attendance in San Antonio. Maria, Richard, and Ray confirmed they will be in attendance. Others plan to participate via conference call. Jane has asked Jerry Parr to provide a conference phone in the meeting room.

- 3) Resume review of internal comments to VDS; start with Line 22, Section 5.1.1 of the Provider tab then jump to Line 13, Section 4.1 of the Provider Accreditor tab

Provider Tab:

Line 22, section 5.1.1

The committee discussed the implications of the requirements implying that multiple certifications are needed by each Provider. Jane noted that the 5.1.1 statement implies that ISO 9001 contains requirements specific to audit samples and their production, which it does not. The committee concluded they do not currently know enough about the ISO standards to respond appropriately to the comment. Discussion was tabled to be resumed in San Antonio and with Dan Tholen's participation.

Provider Accreditor Tab:

Lines 13, 14, 15, Section 4.1

Maria explained the ongoing question of oversight of the SSAS table. The TNI Board has not yet decided if a committee other than the PT Board will oversee it. Jerry Parr has suggested a generic statement of "committee designated by TNI Board", rather than naming a specific committee for the purpose of the Voting Draft Standard. The TNI Board will be meeting on Friday in San Antonio, and this issue can be proposed to them at that time. Jane also noted the TNI bylaws need some revision to recognize SSAS as a program. SSAS has some similarity to PT, but the PT Board does not really have any expertise in SSAS. The expert committee feels strongly that it should be the oversight committee for the SSAS table and that it can recruit needed expertise from other areas as needed. All members were in favor of proposing expert committee oversight to the TNI Board.

Maria will develop a formal proposal for the TNI Board. Maria noted the timeline for their decision may be after the standards need to be formalized. She will contact Jerry after the call to see what his suggestions are.

Line 18 and 19, section 6.1 f)

The commenter noted that conflicts of interest can occur with the other participants besides laboratories and suggests noting the other potential participants. This would be a situation where a laboratory could also be a SSAS provider. In this case the laboratory couldn't provide analysis of its own audit samples. The Provider should not have a financial interest in any lab performing its audit samples, although this is sometimes hard to determine, and the provider/laboratory might not be aware of all potential

conflicts. Financial interest in another company is not always known by everyone involved.

Maria suggested dropping items i) and ii) from this section and add the suggested note. This would leave it to the PA to determine if there is conflict of interest.

Richard motioned to refer to section 5.2 in the Provider document and drop most of what is in f) – all were in favor of the motion.

Line 20, Section 6.3.1

Dan Tholen provided recommendations regarding the periodic data review by Provider Accreditors. The committee discussed the implications of the two proposals. Jack motioned for option #1, Gregg seconded. All were in favor of the motion.

Participants Tab:

Line 2, regarding Guidance document

Gregg motioned to accept Maria's suggested response and Richard seconded. It was questionable whether state agencies other than the ones involved in the SSAS committee will be in a position to answer questions about the SSAS standard/program. All were in favor of the motion.

Line 3, General comment

Maria has drafted a response about a comment related to costs of the program. Costs are not usually incorporated into the standard. TNI won't know all the costs involved until the standards are completed and the regulations are finalized. Providers have to be accredited, have to meet the requirements of the standard (not to send the same concentrations twice, homogeneity testing, etc.), all of which drive the cost up. Right now providers can operate at an economy of scale. The committee decided to discuss off line the SSAS requirements that directly impact cost – Ray will take the lead and circulate a proposal for comment.

Richard motioned to accept Maria's suggestion and Gregg seconded. Jack suggested the note be amended to replace "will not build" with "will try not to build", in the second sentence. All were in favor of the motion.

Line 4, General comment

The commenter questioned why do labs need to do an audit sample if the lab is accredited, does PT samples, etc. An appropriate response was

proposed by Richard's team in Line 30 of the spreadsheet regarding the question of SSAS frequency, etc. Also see Lines 31 and 32 in the spreadsheet. EPA regulation determines the need for the audit samples and regulatory bodies want to verify the test as the basis of the SSAS program.

Discussion on this topic continued via email after the conference call concluded. The committee agreed on two actions:

- 1) Broaden the definition of an audit sample. The expanded definition is what was used in the EPA proposed CFR. It clearly differentiates an audit sample from a PT sample without mentioning what a PT sample is, which does not belong in the SSAS Standards. The definition of an audit sample should stand alone.
- 2) State differences in purpose of the two types of samples in the Participants guidance document.

Next meeting of the committee is during the TNI Forum in San Antonio. Jane will circulate conference call arrangements for those not in attendance. The committee will continue to meet weekly to review/resolve comments following the San Antonio meeting as needed.