TNI Stationary Source Audit Sample Expert Committee Teleconference
October 19, 2009

Participants:
Committee members -
Maria Friedman, Chair
Richard Swartz, Vice chair
Michael Klein
Gregg O'Neal
Stan Tong
Mike Schapira
Jack Herbert
Ray Merrill
Jane Wilson, program administrator

Guests -
Chuck Wibby
Frank Jarke

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

Maria confirmed the documents for today's conference call were emailed Monday morning October 19th. Jane provided the October 14th meeting minutes in a separate email.

2) Review and approval of minutes from teleconference on October 14, 2009

Gregg motioned to accept the minutes as written/Richard seconded. All were in favor so the motion passed.

3) Continue discussion on who enters "Other Data" into the SSAS Central Database

Maria asked Chuck Wibby for his input on this topic as a PT provider. PT providers have specific requirements, which are typically restricted to manufacture of samples and data reporting for activities within their control. While four additional pieces of data entry don't seem like a big deal, PT providers would prefer to be responsible only for those things within their control.

Gregg noted that emissions audits are only loosely tracked now, but the regulation is being stepped up. The PT provider could require the information to be reported as part of their reporting form. Sometimes audits dates are delayed and would end up being different from what was originally scheduled with regulator. Chuck likened the PT provider to a Xerox machine – they don't change anything, they just report what is given to them.

The other issue that has been raised is that these other data are not defined in the SSAS standards. The PT providers still have to review the data if they are entering it. The committee discussed the legal implications of data entry problems. Could the PT provider be held accountable for it? It's not falsification of records.

The EPA proposed rule indicates the audit sample provider has to have a database, not that there has to be a central database where all providers put their data. Not every field was strictly defined during the standards development process. The other data help match up which audit sample result goes with which source.

Ray suggested looking at the existing EPA program to define the information links. If there are other data required, the audit request will need to define all the required data. How is the provider going to keep up with schedule changes, etc. If the data are not provided, who chases down the data? The entity that has control over that data should enter it (but we have limits on who can enter data).

In response to Ray's concern, Chuck stated that audit sample results cannot be submitted until all the data are entered. That means, the clock for Provider submission of the report does not start until the Provider is supplied with all of the data fields necessary for submission.

Chuck added that similar data have been collected and recorded by providers under other programs, such as the DMRQA program. Project data cannot be submitted until all data are entered. As long as this is so, dealing with these few more fields would not take excessive effort. When this other program started, they had to make some calls to people reporting data about information people were not used to reporting, but not so many calls after people got used to reporting these new data.

The proposed EPA regulation indicates that data are to be available from one of the participants. There is a need for defined formats for the fields. If the data weren't complete, a call goes to data submitter to put responsibility back on lab/tester.

Roll call vote on the inclusion of Other Data under the provider –

Motion – providers to add into database the following pieces of data:
Start date
End date
Collector ID (from database)
SS project test ID (should be unique number)

Gregg – yes
Jack – yes

Michael K – yes
Richard – yes
Ray – yes
Mike Schapira – yes
Stan – yes
Maria – no

Vote is 7-1, motion carries.

4) Discuss Guidance Document for Participants

Maria provided some background on the list of ideas for guidance that she initiated. Right now there is no set format for TNI guidance documents. Jane suggested a place to start might be development of FAQs.

Some of these items (4 and 5 below) are better addressed by EPA since they relate to the EPA program. They could be addressed in TNI guidance if there are documents or other items that can be directly referenced or cited. Another way to address it may be a disclaimer that directs user to the regulation itself or regulatory agency.

4. What if a Facility fails to order audit samples and the Regulatory Agency does not intervene?

5. What if a compliance test program is completed without audit samples? Does that invalidate the test program?

The types of FAQs needed will vary based on the different SSAS program participants. Possible guidance document topics:

- How to find a provider
- How far in advance to order the audit
- Do they need to be NELAC accredited
- Complaints handling procedures
- Explain a failing audit result and what happens then (corrective action).

EPA may be developing a guidance document for how to select an appropriate audit sample range. Should the SSAS guidance address this or could reference it when it's done (contact Gary McAllister).

Maria encouraged the SSAS committee to go back in their notes to identify other items. Topics may be either in committee minutes or the response to comments spreadsheet. Some may be in email correspondence. Other forms of guidance to be developed could be a flow chart of the SSAS process, check list etc, for whole process in chronological order. Guidance may be needed on the project test ID, since it's not defined in the standard. Each source tester has their own way of

doing this right now. The guidance could establish a recommended format, such as a specific number of characters, etc. Some testers are not using such a system yet. Instructions on accessing the central database for information should be included. Information is needed for properly utilizing the audit samples and/or test methods, such as what equipment is needed. An example would be the CGA 350 regulator needed for methods 25 and 18.

Maria requested the committee to continue listing ideas for the guidance document before the next meeting. Chuck Wibby requested to participate as an associate member in place of Henry Beaucamp and Josh Wyeth from Wibby.

Next meeting is Oct 26th 2:00 pm EDT.