TNI Stationary Source Audit Sample Expert Committee Teleconference
October 26, 2009

Participants:
Committee members –
Maria Friedman, Chair
Richard Swartz, Vice chair
Michael Klein
Gregg O'Neal
Stan Tong
Mike Schapira
Jack Herbert

Associate members –
Chuck Wibby
Mike Miller

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 26th.

2) Review and approval of minutes from teleconference on October 19, 2009

Michael Klein noted that he sent corrections via email to Jane, to replace "tester" with "test" in two places in the minutes where the discussion referred to a stationary source project tester ID.

Jack also proposed corrections to existing language in the minutes where Chuck compared similar data entry concerns in the DMRQA program, with the data entry concerns we discussed for the SSAS Central Database. Jack preferred that it be recorded more specifically that similar data (and not "similar issues") were collected and recorded (and not the generalization "dealt with") by Providers, as these were what he recalled Chuck stated during the 10-19-2009 meeting. Maria asked Chuck if he believes Jack's recollection was accurate; Chuck concurred.

Jack also noted that the minutes does not reflect Chuck's response to Ray's concern when any or all of the four "Other Data" that the Providers will enter into the SSAS Central Database (the motion in question) are missing from the audit sample results submission. Jack noted it is important to record this discussion since it was the argument or reason that swayed Ray to vote affirmative to the motion. So as to ensure the correct language is recorded, Maria requested Jack to consult with Ray and Chuck (offline) to confirm the statements made and email them to Maria by COB on 10-27-2009. When confirmed language is received, Maria will amend the minutes and request a vote via email.

3) Continue discussions re. Guidance Document for Participants

Maria noted that the Guidance Document the committee is writing may be amended as needed, so if any member thought of any further clarification or guidance, they may be later added (or deleted), as appropriate, with committee's approval.

Prior to discussing in detail each of the proposed guidance statements/questions, Maria requested a volunteer to discuss the audit sample process from beginning to end. Gregg volunteered:

a) The source to be tested is identified – perhaps by a Regulatory Agency, or as defined in a permit, or by anybody wanting to capture emission characterization data.

b) Facility (owner of source) brings on board or hires consultants or testers to write the Test Protocol.

c) Test Proposal is written – defines methods, analytes, type of sources, etc.

d) Audit samples are identified. Regulatory Agency has discretion whether to order audit samples. In the proposed rule, audit samples will be ordered if they are available. Appropriate concentration range may be based on regulatory limit, past testing data, or guidance from EPA.

e) Facility orders audit samples. Regulatory Agency may change order (e.g., change the concentration range).

f) Laboratory analyzes audit samples.

g) Laboratory submits audit sample results to Provider.

h) Provider submits audit sample results and evaluation to appropriate Participants and to the SSAS Central Database.

i) Regulatory Agency reviews report and makes final decision to accept results or require corrective action.

The committee continued with the discussion of each item in the proposed Guidance Document based on the chronological order of occurrence in the audit sample process, as summarized by Gregg. Maria noted that there will be no voting per item at this time (may be needed later); all items will first be discussed, committee to review, then vote collectively:

a) *Define differences in purpose between an audit sample and a PT sample* – Maria noted that the definition used in the SSAS Standard for an audit sample clearly states how it is different from a PT sample. Chuck added that an audit sample is specific to a project, whereas, a PT sample is a general sample for laboratories to demonstrate they can perform the method accurately and meet accreditation requirements. Stan suggested to also state the differences between an audit sample and a QC sample but since QC samples are also used in PT studies, then its definition will be added in the Guidance Document as a separate line item. Maria will ask Chuck's help with definition for QC sample.

b) *How do I find a Provider?* – Chuck noted that the TNI website provides a list of PT providers. He added that TNI is also working with A2LA (Provider Accreditor) on how to publish the prospective list of providers of air samples. Maria said she would consult with Dan Tholen if there is a plan where the list for audit sample providers may be posted.

c) *Will the Regulatory Agency handle the approval process for audit sample requests separately from the review of the Test Protocol?* – Maria noted that Jim Serne previously brought up this question. She asked the committee whether they think the question should be added to the Guidance Document. Gregg thought that since the TNI SSAS Program is new, it would be a good idea to do so. Gregg noted that the Test Protocol is submitted for review in advance (45 to 60 days) prior to the audit sample request. Michael Klein added that the Test Protocol includes the concentration range allowed, so the Test Protocol is first approved, the test is scheduled, and then the audit sample is ordered. However, since there may be differences in approval procedures among different Regulatory Agencies, then it should be added to the answer to consult or check with the appropriate Regulatory Agency for clarification.

d) *Do Laboratories need to be NELAC-accredited to analyze audit samples?* – Everyone agreed that it is not needed. However, Mike Miller noted that any Regulatory Agency may require another type of accreditation or certification so the answer to the question should include a directive to consult or check with the appropriate Regulatory Agency. Additionally, Mike Miller suggested generalizing the question; removing the reference to NELAC.

e) *Does one audit sample apply to more than one test? For a test for 10 different sources, are the Facilities required to purchase one audit sample, or are they required to purchase 10 audit samples*

(one per source)? – Michael Klein explained that the answer would be on a case to case basis, as determined by the Regulatory Agency. Sometimes, it may depend on a time frame or sometimes on the number of emission units. Stan agreed with Michael's explanation and suggested to use the same language in the Guidance Document. Maria requested Michael to email her the language.

f) *What if a Facility fails to order audit samples and the Regulatory Agency does not intervene?* – Stan said he will email to all the disclaimer that may be used as a template for the Guidance Document.

g) *What if a compliance test program is completed without audit samples? Does that invalidate the test program?* – Stan said he will email to all the disclaimer that may be used as a template for the Guidance Document.

h) *Use COC when transferring samples from field to Laboratory* – Mike Miller stressed that no sample should go anywhere without an accompanying COC record, even for unopened audit samples. The Provider will enclose shipping documents with audit samples and handling thereafter must include COC record. Mike Schapira explained that in their laboratory, they receive audit samples in the same box or container as the field (source) samples. Their clients include COC record, so use of COC is already in place. Gregg noted that Regulators are present when containers or boxes of audit samples are opened in the field and thought that COC should only be needed from that point on (when the boxes are opened). He also asked Chuck if special storage information is identified when PT samples are shipped. Chuck responded that, in his company, the information is provided on the outside of the packaging and is repeated in the handling or preparation instructions contained inside the packaging. Maria thought that whatever is acceptable to the Regulator should be appropriate and in short, the answer to the question is yes.

Maria halted the discussion at this point; committee will continue on November 2nd, 2:00 PM EST. Meeting was adjourned at 3:38 PM EDT.