

TNI Stationary Source Audit Sample Expert Committee Teleconference for  
October 4, 2010

Attendance:

Maria Friedman, Chair	Committee member	present
Michael Klein	Committee member	absent
Ray Merrill	Committee member	present
Gregg O'Neal	Committee member	present
Michael Schapira	Committee member	present
Jim Serne	Committee member	absent
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	present
Ty Garber	Associate member	absent
William Daystrom	Guest	present

- 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 10/1/2010 e-mail.

- 2) Review and approve minutes from teleconference on September 27, 2010

Gregg moved to accept the minutes as drafted. Richard seconded. All were in favor.

- 3) Review of Final Rule vs. TNI SSAS Program

Maria gave an overview of the spreadsheet on the new rule comparing it to the TNI standards and program. All rows highlighted in yellow have already been approved, either by e-mail or during previous discussions in the teleconference.

Row 44 – The Committee reviewed the proposed changes to Section 4.1.1 of V1M3, as submitted by the Regulatory Agencies headed by Richard. No changes were deemed necessary for Figure 1.

Maria pointed out that Section 4.2.1 of V1M3 still needs to be reviewed since it still states that the test plan, which is no longer required per the Final Rule, needs to be reviewed. Maria added that, perhaps, Section 4.2.1 is not needed since Section 4.2.2 of V1M3 would cover the required review. Before going further, Shawn was requested to read Sections 4.2.1 and 4.2.2. Thereafter, Gregg suggested to replace "test plan" with "pre-test or preliminary information" in Section 4.2.1. Shawn proposed to add reference to Section 4.1.1 to Gregg's suggested language, so it is clear what are being reviewed.

Maria requested the Committee to approve the proposed changes, but first explained that all votes requested during specific discussions or via e-mail re. the comparison study are approvals needed to complete TIAs for the Consensus Standards

Development Executive Committee (CSDEC) to review. Final vote from the SSAS Expert Committee will be requested during the comment period for the TIAs, when posted on the TNI website.

For Row 44, all voting members approved, via voice vote, the proposal from the Regulatory Agencies and the changes to Section 4.2.1, as follows: "The Regulatory Agency shall receive and review the pre-test or preliminary information from the Facility, as defined in Section 4.1.1 above."

Row 58 – The Committee reviewed this other assignment from the Regulatory Agencies to determine what the appropriate terminology is for the compliance start date and to provide the definition. Maria noted that she added the phrase "whichever comes first" to the end of the proposed definition since the Final Rule allows for an audit sample to be first completed, in some cases, even before an emissions sample is collected.

Discussions ensued in regard to the above allowance from the Final Rule. However, Maria reminded everyone to focus on the questions at hand, mainly, the appropriate term for the compliance start date and the definition.

Everyone agreed with the proposed term "Stationary Source Test Start Date." For the definition, Gregg cited an example, in the case of Method 25, if the compliance test failed and the audit sample passed, the compliance start date is not that of the audit sample but would be the successful compliance test start date, however far off from the audit sample date. Mike Miller stated that, in New Jersey, they use the audit sample date as test date and even if the actual compliance test start date is next day, they use the audit sample date. Gregg suggested adding a Note to the definition to indicate that the audit sample date is used if the compliance test failed. Stan suggested to remove reference to "audit sample" in the proposed definition. Ray added that EPA's guidance for emissions test report indicates that the test date should be included and that Stationary Source Testers may provide a date range instead of a fixed start date. William responded that, if this situation occurs, the SSAS Central Database needed one date, not a range. It was suggested that if a range was involved, that the first date be reported in the SSAS Central Database. Everyone agreed. From further discussions, the phrases "or audit sample" and "whichever comes first" were deleted from the proposed definition.

For Row 58, all voting members approved, via voice vote, the term proposed by the Regulatory Agencies and the changes to the proposed definition, as discussed: "Stationary Source Test Start Date: The initial date that a stationary source test sample is collected for subsequent analysis."

Row 59 – Maria requested everyone to re-examine Michael Schapira's suggestion to include Stationary Source Testers in the proposed language to Section 8.3f in V1M1. Shawn thought that the SSAS Standard does not define Stationary Source Testers, but the Standard does. Stan recapped that the Stationary Source Testers were not added to the language because they can work for multiple Facilities, and we do not want to limit or prohibit this capability. Shawn assured that unique numbers are assigned to each audit sample, and Participants would not be given Provider lot numbers. As such, no further changes to 8.3f were made (at least at this time).

Row 36 – The SSAS Table subcommittee was requested to submit proposed language to address Row 36, before the next teleconference.

Maria described the specifics of how the TIA process works: The SSAS Expert Committee writes the TIAs for CSDEC approval to ensure these TIAs meet qualifying requirements defined in TNI SOP. If CSDEC approves, the TIAs will be posted on the TNI website for 15 days for public comment. SSAS Expert Committee reviews comments, finalizes TIAs, and approves final TIAs with  $\frac{3}{4}$  affirmative vote of voting members. TIAs become effective 20 days thereafter and continue to be valid up to two years (at most) or until current Standard is revised. At that time, the TIAs become part of the Working Draft Standard (WDS) and the process continues as was done when the current SSAS Standard was made and approved.

There would be approximately 60 days of wait time for TIAs to be in place, then the Provider Accreditor accredits Providers, and EPA updates website for audit sample availability. Overall, 12 to 20 weeks would likely pass before an audit sample is commercially available, sold, and used. Stan added that any EPA approval would likely be in the form of a letter approving the TNI SSAS Program.

Gregg asked if the SSAS Table is ready for EPA's review. Maria said that no update has been submitted to date to the SSAS Expert Committee for review. Maria asked if the SSAS Table subcommittee used outside data in their current review, since outside data are not likely to be approved by EPA (awaiting EPA's response). Shawn responded that acceptance limits were calculated from EPA data, that the subcommittee used the TNI SOP for sanity check, and that all discussions were in the subcommittee minutes. Maria noted that clearer documentation is needed for EPA's review, not just the minutes.

From the EPA QA call attended by Regulatory Agencies, Gregg reported that EPA would likely respond to the questions posed by the SSAS Expert Committee, this week.

October 11<sup>th</sup> being a holiday for Regulatory Agencies, the next meeting was set to October 18<sup>th</sup> at 2:00 PM EST.