

TNI Stationary Source Audit Sample Expert Committee Teleconference  
November 23, 2009

Participants

Committee members -

Maria Friedman, Chair

Richard Swartz, Vice chair

Stan Tong

Gregg O'Neal

Mike Schapira

Jack Herbert

Michael Klein

Jane Wilson, program administrator

Associate members -

Mike Miller

Guest –

William Daystrom

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

Maria confirmed the documents for review today – the agenda, checklist, two flowcharts, and the November 16 minutes emailed by Jane.

- 2) Review and approval of minutes from teleconference on November 16, 2009

Jack asked to clarify which committee is being referred to in the last paragraph regarding the action to undertake the redevelopment of the SSAS table. Maria will provide an update on this topic today.

Richard motioned to accept/Michael Klein seconded. All were in favor of the motion.

- 3) Chair update

Maria updated the committee regarding the process for reconvening the subcommittee that developed the SSAS tables. Maria spoke to Eric Smith (TNI PT Board Chair) about it. The PT Board had some concerns about why the SSAS committee was overseeing the table process rather than the PT subcommittee that originally developed it. Maria invited any PT Board and PT subcommittee members interested could be involved in the SSAS table update process. Maria will provide TNI with documentation about how the SSAS committee established their oversight in the consensus process. Maria noted that the revision of the table will be done at the level of the Expert Committee. Jeff Lowry has volunteered so far. Other interested parties should notify Maria by Nov 30<sup>th</sup>.

Maria has requested historical data from EPA via Candace but has not received a response yet.

The SSAS table right now is based on published methods. Ideally EPA will finalize the new CFR at the same time as the current samples are phased out. If samples are stopped and the rule is not yet finalized, TNI would have to use the SSAS table as is. A revised table can be issued, but those samples cannot be used as official audit samples until the CFR is updated. TNI should provide some documentation as to the establishment of acceptance limits (based on some rigorous process). Does TNI have to notify EPA for every future change to acceptance limits? Stan didn't think that was the intent, and that EPA was stepping out of the process to allow the TNI consensus group to establish defensible acceptance limits. EPA hopes the privatized audit program will evolve to eventually include audit samples which test both the field sample collection portion and the laboratory analysis portion.

Maria has requested a page for the SSAS program on the TNI website. Right now it will be under the Standards tab and has the final standards posted. Jane asked if this will be where all of the SSAS program area information will ultimately reside or if it will be with the other programs such as the PT program. There could also be links from other pages such as the SSAS committee page.

#### 4) Discuss flowchart/checklist for FAQ document

Maria noted that it seems the checklist and flow chart are very similar and have the same information as content. Gregg noted that some people think graphically, so it might be good to have both. Gregg noted that the logic statements from the flowchart content could be added to the checklist. The committee discussed whether we should maintain both pieces of information, since users may have a preference for the format of information. It was agreed that people might use each differently, so it might be good to keep both for the start of the program. The intent is that the participants have a clear understanding of the process, so having both supports that goal.

Review of flowchart content:

A general comment is that the flowchart needs to indicate the additional relationships between specific steps so the chronological flow is easier to understand.

Facility flowchart

- Add a reference (footnote) for SSAS table for whether audit sample is available

- Add a note about whether an audit sample is required for each test method and analyte. This could also be part of FAQs as a way to keep the flow chart as clean and uncluttered as possible.
- In third step, the committee discussed whether something about concentration range should be included. Is this an estimated or suggested concentration range? The Facility won't know if this range is what they will actually get in the sample. The regulatory agency will weigh in or the Provider will have to use the estimated range from the Facility. There could also be a reference to the planned EPA guidance document. If EPA doesn't provide detailed guidance, the SSAS committee may have to. The committee agreed to add a note about consulting EPA guidance or the regulatory agency about the concentration range. The Facility can estimate what they expect to collect (expected concentration range).
- Don't need Facility to report results to the regulatory agency (remove this box).
- May need to look at corrective action with regulatory agency, tester and lab if failure of audit sample.

#### Provider flowchart -

- Consider whether to add decision points to the provider flowchart.
- Need to add a step to deliver the sample to source tester.
- Evaluates results and reports to participants.

#### Stationary Source Tester flowchart -

- Facility and source tester are both participating in the test, so that step can be included under both flows (conducting source test).
- Add suggestion about whether audit sample is collected in the field.
- Stack tester prepares stack test report, including documents from lab and field. This report is finalized after audit sample results received when possible.
- Completed stack test report goes to the facility and/or regulatory agency if directed by facility.

#### Laboratory flowchart –

- Analyzes samples and reports results to provider.
- Lab submits raw data to tester for their report.

#### Regulatory agency -

- Regulatory agency also receives stack test report (add step to this flowchart).

Maria will revise the draft in flowchart software and provide it for review again next week.

Gregg asked if the committee will develop a critical path that defines the minimum and maximum times to completion. Maria suggested the committee keep things simple to start with.

Next meeting is Nov 30<sup>th</sup>, 2:00 pm EST. The committee will again discuss the FAQs, checklist, and flowchart.