TNI Stationary Source Audit Sample Expert Committee Meeting
March 15, 2010

Attendance:

Maria Friedman, Chair	Committee member	present
Jack Herbert	Committee member	present
Michael Klein	Committee member	present
Ray Merrill	Committee member	absent
Gregg O'Neal	Committee member	present
Michael Schapira	Committee member	present
Jim Serne	Committee member	present
Candace Sorrell	Committee member	absent
Richard Swartz, Vice-chair	Committee member	present
Stanley Tong	Committee member	present
Jane Wilson	Program Administrator	present
Shawn Kassner	Associate member	present
Mike Miller	Associate member	absent
Ty Garber	Associate member	present
Mike Hayes	Guest	present
William Daystrom	Guest	absent
Jim Presley	Guest	present

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

Maria noted that all documents for this call were sent via email on 3-12-2010. All confirmed receipt of the email.

2) Review and approval of minutes from teleconference on March 1, 2010

Jim Serne moved to accept the minutes as drafted / Mike Schapira seconded. All were in favor of the motion.

3) Resume discussion re. SSAS FAQ

Maria provided an update regarding the voting for the SSAS permission matrix. The committee voted to approve the matrix following the last meeting. Maria has provided the matrix to William and he is working on incorporating the permissions. He expects to be able to provide a status report to the SSAS committee by April 5.

On accreditation of providers, A2LA is still working out some checklist and application issues before accreditations can move forward according to an update from Ty Garber.

Maria reviewed the EPA concern about the FAQs document and the TNI administration of SSAS program. EPA is concerned about whether TNI should post FAQs about some of the topics. This concern pertains to several of the current questions, such as the implications of not ordering an audit sample. As requested, the committee regulators were trying to elaborate on some of the FAQs, but EPA is concerned about the implications of TNI posting answers to questions related to regulatory oversight.

Jim S is concerned the SSAS program could be implemented in 50 different ways across states in the absence of specific guidance. He questioned whether EPA will be posting detailed guidance so that the program can be implemented consistently. Maria noted

that EPA has indicated they will do so, and the committee can still post FAQs if limited to the scope of the TNI program. The program is still evolving, but in the interim the committee should let EPA take the lead. TNI will need to work closely with EPA in order to enable the program to grow. TNI can still have the FAQ document, but it will be limited to issues related to the TNI SSAS standards.

Jim S noted that he has talked to regulators and other stakeholders outside of this committee and they are not aware of the coming changes in the EPA audit sample program and that it is being privatized. Richard noted some states are not participating on the monthly calls for regulators and are missing an opportunity to learn about it. Richard suggested passing that information along to improve participation on that call. It was also suggested to use SES as a way to disseminate information.

Shawn K suggested EPA should organize a special meeting or other means for disseminating the information more consistently as there is a lot of confusion in the audit sample community. It was also suggested to send information to licensed facilities and testers as another form of outreach. Jim could also send something to EPA on behalf of SES as a means of bringing attention to the issue. Jack recommended contacting the National Association of Clean Air Agencies as well (http://www.4cleanair.org/) .

Maria asked everyone to refer to the FAQs to determine what revisions are needed. The old version will be kept for archive if needed later since the committee doesn't know what EPA will cover until the final rule is completed. The committee reviewed the FAQs document as follows:

Disclaimer – Jack suggested having it limited to stating it is a TNI program for the provision of audit samples. Maria suggested committee members send comments via email as to whether to keep it, reword it, etc.

Q1 – keep as is

Q2 – keep as is

Q3 – keep, and could also add reference to the TNI website

Q4 – delete

Q5 – The TNI standard does not require TNI accreditation, but it might be required at state level. It was suggested to rephrase the question to indicate whether TNI standards require accreditation and delete the regulatory references. Richard is not sure we should keep it as he's not sure who will ask the question. It will strictly be the purview of the regulatory agency, who will require or not require an accredited lab. Jim agrees. All were in favor of removal.

Q6 – delete

Q7 – delete

Q8 – delete

Q9 – delete

Q10 – Need to check whether TNI standard requires COC – Shawn will check.

Q11 – Jack suggested the need to qualify this answer based on individual state processes as the time frame will vary. The order date should be based on the sufficiency of the information submitted to the regulator. Maria noted the FAQ can be revised based on what's in the TNI standard. It could be indicated as a minimum time frame based on other factors. Another suggestion is to express the time frame as 21-30 days from regulatory approval and adjust the question. Maria added Q11 to questions to be revised via email. Jim asked if this applies to just approval of the audit sample, or also protocol, etc. This is just for the sample.

Q12 – keep as is

Q13 – The committee discussed whether to keep this question, but take out the reference to the regulatory agency. There is a definition for corrective action in the new TNI standards for labs, primarily in reference to PT samples. It is still a regulatory decision about whether corrective action is requested. There are not a lot of ways to do corrective action other than perform another test. EPA should define what constitutes corrective action for audit samples. The committee agreed to remove.

Q14 – Keep the flowchart for now, and Maria asked committee members to review the notes for possible revisions.

Q15 –The facility/tester creates this ID. The committee agreed to revise the question to refer to the facility/tester to show it's their responsibility to create the ID and be aware of the required format for the central database.

Q16 – This question pertains to past issues with EPA providing an audit sample cylinder but the appropriate type of regulator was not available with the sample. Are providers going to provide the necessary equipment with the sample? There is a cost associated with it – could be $600 per sample and the equipment might not get returned. It was agreed to reword the FAQ to be more generic regarding what equipment might be needed by the testers, and to check with provider on equipment availability or the need for specific fittings or sizes, such as CGA fittings.

Q17 – keep as is

Maria asked the committee members for email comments on the disclaimer and the other questions noted in the discussion as well as reviewing the notes to the flow chart.

Next meeting is March 22, 2010, 2:00 pm ET.