

TNI Stationary Source Audit Sample Expert Committee Teleconference
March 29, 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	absent
Jim Serne	Committee member	present
Candace Sorrell	Committee member	absent
Richard Swartz, Vice-chair	Committee member	present
Stanley Tong	Committee member	absent
Jane Wilson	Program Administrator	present
Shawn Kassner	Associate member	present
Mike Miller	Associate member	absent
Ty Garber	Associate member	absent

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

Maria noted that all documents for this call were sent via email on 3-26-2010. All confirmed receipt of the email.

- 2) Review and approval of minutes from teleconference on March 22, 2010

Via email, Mike Schapira raised a question about Ray's comments on the current supply of audit samples related to tests being scheduled for August (Ray was not on the line at this time). The Committee decided to add a note of this comment.

Richard moved to accept as amended/Gregg second. All present were in favor (Richard, Gregg, Jim, Maria). Others will be requested to vote by email.

- 3) Progress report from sub-committee re. SSAS Table

Shawn provided a summary of the progress on revision of the SSAS table. The subcommittee met to review methods 6 and 8. They reviewed spreadsheets prepared by Jeff Lowry. The subcommittee also defined their specific role as providing technical recommendations for changes to the Expert Committee. Shawn will be distributing more information for discussion at their next meeting. He asked for the deadline for completion of the revised table for the EC. EPA still planning to finalize their new rules by April 30 and Maria will confirm the date with Candace and Gary. The committee discussed whether the new table is needed by then and will the Provider Accreditor have to reassess Providers after the table is updated. Shawn isn't sure the subcommittee can have the table revised by April 30th. Providers don't need to be reassessed when TNI tables change, but they will need time to implement it. If the revised table is not done by then, the existing table will carry over.

It was asked if there is Implementation time scheduled for the EPA rule. Richard says there is usually an implementation period but he hasn't heard how long it is yet. Maria

will include this in the questions to Candace. Shawn is working on getting more data for subcommittee review – Test America has been providing some.

4) Resume discussion re. SSAS FAQ

Maria added TNI's proposed Guidance Document header language (in red). She also added the reference to EPA EMC website for applicability and enforcement questions.

FAQ 4 – Maria proposed to retain the NELAC lab accreditation reference due to TNI's relationship to the NELAC program. The committee endorsed the proposed language.

Maria reviewed some of the other FAQs discussed last week.

FAQ 12 – Maria proposed adding this question about users looking for information on applicability and enforcement. Ray also suggested using a different EPA website link (emailed by Ray). Maria will also notify Candace that TNI is providing both the website links and email addressed to interested parties.

Other changes in red are self-explanatory or were discussed last week.

FAQ 5 – COC question was discussed by the committee. The previously approved language was reviewed and it was confirmed that COC requirements are not in the TNI standard. The answer could be amended to state that COC is recommended. Also, the audit sample is to be treated the same as a field sample, so its handling must comply with the test plan and any COC requirements defined in the test plan. If it's required for the test sample, it's required for the audit sample. Jim Serne asked whether COC starts with the Provider. Maria and Ray thought it starts in the field and Shawn agrees. COC starts when the shipment of the audit sample is opened. Making it a recommendation should be acceptable. If it needs to be a requirement, perhaps EPA should cover it in their program, although it's unlikely they will. EPA will likely defer to the states. COC should probably be addressed within the test plan if it is to be required. Maria will also clarify in the answer that COC is not required in the TNI standard.

Disclaimer text

Maria noted the proposed TNI language for Guidance Document disclaimers. This text is not final yet. Shawn suggested removing all but the last 3 sentences of the old disclaimer. Others agreed to keep that portion as well. The EPA paragraph should be last in order. The 3 sentences from the old disclaimer will be added to the end of paragraph 2. Maria was concerned about the regulatory agency sentence and whether it could be confusing to users. Ray suggested having everyone take another look at it after the changes are made and distributed to the committee.

Ray asked if any other questions have been raised in the public process that should be reflected in the FAQs. He suggested adding something to the FAQs document about submitting additional questions to Maria/SSAS Committee for response.

Maria noted that William won't be available for the April 5th meeting but will update the committee on database development at the April 12th meeting.

Next meeting is April 5th to finalize the FAQ document.

