TNI Stationary Source Audit Sample Expert Committee Teleconference
April 19, 2010

Attendance:

Maria Friedman, Chair	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	absent
Candace Sorrell	Committee member	absent
Richard Swartz, Vice-chair	Committee member	present
Stanley Tong	Committee member	present
Jane Wilson	Program Administrator	absent
Shawn Kassner	Associate member	present
Mike Miller	Associate member	absent
Ty Garber	Associate member	present
Mike Hayes	Guest	present
William Daystrom	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 4-16-2010. All confirmed receipt of the email.

2) Review and approval of minutes from teleconference on April 12, 2010

Mike Schapira moved to accept as drafted; Richard seconded. All were in favor.

3) Discuss Data Removal Request Form in the SSAS Central Database

Maria reminded everyone that use of the subject form should be limited to errors due to typos and not those related to disputed results. Also, only Providers will see and use the form (at least at this time).

Stan asked how the form will be tracked; should entry for the date be added? Gregg noted that since the form is to be used online, then the SSAS Central Database (hereafter, central database) will record the date/time stamp of use. William confirmed this arrangement.

Shawn explained that the decision whether to just amend portions of the data where errors were found or replace the whole data will be based on a case-by-case basis, and may need Regulatory Agency approval. Ty agreed and added that Providers also look at where errors originated.

Maria asked then if original data, whether later amended (in portions) or replaced (in whole), should be retained in the central database or overwritten. Regardless, Maria noted that an audit trail must be set up to track history of revisions to data. William confirmed that an audit trail will be added as a feature.

Michael Klein described how revisions are made to data in the EPA's SSCAP database (in the case of NJ): he notifies Candace of the revisions and then Candace makes the revisions. In this case, therefore, Michael already has the history of the revisions made, which is sufficient for his tracking, and there is no need to store original data. Gregg, however, thought that in the case of the central database, where there may be cross-viewing of data among various Regulatory Agencies, it may be a good idea to retain old data to track who are revising their data frequently. Richard noted that, if this is a frequent occurrence, it may be burdensome or cause an overload to the central database to retain old data (having too many revisions that may not be needed or viewed at all).

Shawn reported that his organization, as a Provider, encounters many requests to change data after the fact (e.g., 3 times a week for typos). Ty's organization encounters the same but more of the revisions in hardcopy rather than electronic (or database) revisions. Maria pointed out that, with respect to audit sample data and the central database, the data residing in the Provider's database must match those residing in the central database. Michael Klein and Richard noted that data revisions do not occur very often in audit samples, in comparison to those encountered by Shawn and Ty in PT samples.

(Shawn logged off from the call at this time.)

William reported that he can set up two ways to track revisions to data:

(1) Save the copy of the request form (which will contain the details of the reason for the revision) under a separate database that can be queried later if history is needed – this will alleviate the concern re. 'overloading the central database'
(2) Track the changes in the central database itself

Ty commented that the tracking should be simple since the Providers are also responsible for ensuring that their own databases are correct. The central database should not be bogged down with many revised forms.

After this discussion, Stan proposed to call the form Data Revision Request Form.

William first explained why he called the form Data Removal Request Form: Whenever there is a revision to be made to the data that are already in the central database, those data must first be removed then the new data re-uploaded. It is not possible to resubmit data for the same samples/data that already exist in the database. From William's standpoint, data would be first removed then replaced. So, in essence, the form could be renamed as Stan proposed since the complete process is, in general, a revision.

Mike Schapira asked how do we know what revisions were requested; need to know details. William added that there must be enough information on the request form so he is clear what Providers are requesting. Maria proposed that the form should be revised to ask for detailed explanation of the requested revision (e.g., units changed from ug/L to ug/m3; typo).

William proposed that a testing period be established to track what types of revisions have been requested and whether sufficient details have been provided to justify or allow the revision. As a start, William will forward to the committee a copy of the first few data revisions being requested, so the committee can determine whether they were valid

requests and whether sufficient details were provided. In this manner, the committee can track the most common type of revisions and, thereby, improve the revision process as a whole. Perhaps, a drop-down list of the most common type of revisions requested may be added to the form. Everybody supported William's plan.

Maria then asked the committee to review the request form that William emailed and check what other improvements can be made at this time:

> Under the section in the form regarding who should have been already informed of the revision request, Maria proposed to separate the Laboratory from the Stationary Source Tester and add another line (or box) for Provider Accreditor. Ty agreed that the Provider Accreditor should be added to the list, especially if revision is due to technical error. Mike Schapira asked whether Regulatory Agencies should also be notified; they should and are already included in the list. Ty also added that, in the case of his organization, they already have procedures in place to notify Regulatory Agencies but not the Provider Accreditor, so he thought that adding the Provider Accreditor would be a good idea.
>
> (Mike Schapira logged off from the call at this time.)
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> Stan suggested that the Laboratory, Stationary Source Tester, and the Regulatory Agency should, by default, be notified of the revision request. The Stationary Source Tester would be informing the Facility they work with, so it may not be necessary to have a line (or box) for the Facility.
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> (Mike Hayes logged off from the call at this time.)
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> Richard proposed to remove the line (or box) for the Facility. Maria suggested that perhaps a reminder note to the Stationary Source Tester to notify the Facility, if deemed necessary, can be added.

Maria requested Richard to take the lead among the Regulatory Agencies (including Stan) to review Jack's proposed changes to the form, which Jack emailed (to the Regulatory Agencies). This discussion will be an agenda item in the next teleconference.

Maria will resend to all the revision request form, to be amended based on the discussions above.

Next meeting is on May 3rd, 2:00 PM EDT.