<u>TNI Stationary Source Audit Sample Expert Committee Teleconference</u>
<u>September 20, 2010</u>

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	present
Candace Sorrell	Committee member	absent
Richard Swartz, Vice-chair	Committee member	present
Stanley Tong	Committee member	present
Mike Hayes	Committee member	absent
Jane Wilson	Program Administrator	absent
Shawn Kassner	Associate member	present
Mike Miller	Associate member	absent
Ty Garber	Associate member	present
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 9/17/2010 e-mail.

2)   Review and approve minutes from teleconference on September 13, 2010

Richard noticed that the last sentence in the discussion for Row 51 had a negative connotation, which was inconsistent with the sentence previous to it re. availability of new data from the SSAS Central Database. Richard moved to accept the minutes after removal of "not" in the subject last sentence. Jim 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. Rows 1-30 are administrative issues and provide a cross-reference to other sections of the Final Rule. Specific items regarding the TNI SSAS Standard and program begin on Row 31. After the specific items, the Committee will review Rows 1-30 and then start voting. Today's discussion starts from Row 61.

<u>Row 61</u> – The Committee recalled from the last teleconference on September 13, 2010 that Mike Miller suggested not to replace the terms "Acceptable" and "Not Acceptable" with "Passed" and "Failed," since he thinks they may be confused with the final regulatory judgment on the compliance test being passed or failed. Gregg reiterated that this is just simple usage or semantics. Ty commented that the terms "Acceptable" and "Not Acceptable" are what the PT Providers are currently using and that these terms could be easily changed on the Provider's end should the SSAS Program choose to use different terms. Shawn agreed. William added that "Pass/Fail" was convenient for programming purposes, which is why he used these terms, but they can be replaced, if needed.

The Final Rule's requirement for Providers to have their own database is not specifically required in the TNI SSAS Standard, but is sort of a given since it is not practical to participate in the TNI SSAS Program without having their own database. Maria will notify Candace.

No changes needed in the TNI SSAS Standard for the items discussed under Row 61.

Rows 62, 63, 64, and 65 – all applying to Provider Accreditor, ok; no changes to TNI SSAS Standard

Row 66 – EPA Administrator to review technical criteria documents; the Committee needs to complete review and changes as soon as possible.

End of review of specific items; the Committee moved up to Row 1 and so forth.

Row 1 – Ok; no further discussion

Row 2 – Shawn asked if TNI's ANSI approval as VCSB applies across the board with EPA. Maria thought it should, but our Committee is only concerned with the approval for the TNI SSAS Program.

Rows 3 to 10 – Ok; no further discussion

Row 11 – Shawn volunteered to read the definition of "Assigned Value" from the TNI SSAS Standard. Michael Klein suggested to replace the term with "Assigned or True Value." Gregg suggested adding a note that "True Value" is an EPA term. Maria did not think it is needed and that Michael Klein's simpler suggestion will suffice.

Rows 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, and 22 – Ok; no further discussion

Row 23 – not discussed; question/clarification to be posed to EPA

Row 24 – Ok; no further discussion

Row 25 – Michael Klein noted that the TNI SSAS Standard does not require addition of interferents to the audit sample, but "shall be allowed." No changes to be made to the TNI SSAS Standard.

Rows 26, 27, 28, and 29 – Ok; no further discussion

Row 30 – Richard thought the Standard is ok as written; all agreed.

Maria now asked Committee voting members to re-review succeeding rows for voting.

Row 32 – Mike Schapira questioned whether language in the Final Rule required the same analyst to be used on very large projects. General discussion ensued. Basically, all labs use multiple personnel during various aspects of sample handling and analysis. Typically, only one audit sample will need to be used in the case of a large project; this is consistent with EPA requirements for one audit sample for multiple projects within a

short time frame. Should the plural form of "analyst" be used? Final consensus is to replace "same staff" with "same personnel."

Rows 33 and 34 – Ok; no further discussion

Row 35 – Change re. adding "blind" to the term "audit sample" was approved by unanimous voice vote; no objections or abstentions

Row 36 – not discussed; awaiting proposal from SSAS Table subcommittee

Row 37 – Shawn noted that Section 6.2 in V1M1 covers the requirement in the Final Rule. No changes to be made to the TNI SSAS Standard; approved by unanimous voice vote; no objections or abstentions.

Row 38 – Ok; no further discussion

Row 39 – not discussed; question/clarification to be posed to EPA

Row 40 – The proposed definition does not contain the 60-day availability language from the Final Rule; need to add, per Michael Klein. Stan proposed to reference the CFR for the definition of "commercially available." Jim thought it would be better to just add a reference to the EPA website. Gregg asked what if there is only one Provider. Michael Klein responded that there would be no audit sample required since what is posted on the EPA website is gospel. All these concerns go back to how quickly EPA would update their website and how accurate would be the information.

Maria requested all to review the remaining rows (41 and so forth).

New Action Items:

- Maria will update the spreadsheet and propose new language to the sections in the Standard where needed, as discussed.
- To expedite completion of this comparison review, voting members will also be asked to vote via e-mail on previous items discussed, so TIAs can be submitted to the Consensus Standard Development Executive Committee in their early October meeting.

Next meeting is on Monday, September 27, 2010, 2:00 PM EDT.