TNI Stationary Source Audit Sample Expert Committee Teleconference
September 27, 2010

Attendance:

Maria Friedman, Chair	Committee member	present
Michael Klein	Committee member	present
Ray Merrill	Committee member	present
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
Mike Hayes	Committee member	absent
Jane Wilson	Program Administrator	present
Shawn Kassner	Associate member	present
Mike Miller	Associate member	present
Ty Garber	Associate member	absent
William Daystrom	Guest	present
Aaron Fredrikson	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 9/24/2010 e-mail.

Aaron Fredrikson of Pace Analytical Services Field Division participated as a guest. He is interested to understand what responsibilities his laboratory may have with this standard and how to help their clients with SSAS testing.

2) Review and approve minutes from teleconference on September 20, 2010

Mike S moved to accept the minutes as drafted and Richard seconded. All were in favor of the motion.

3) Continue review of Final Rule vs. TNI SSAS Program

Maria has sent six questions covering four topics to Candace, and Maria will share the responses as soon as possible. Eight items were voted on by the committee since the last meeting and all passed by majority vote. Rows 39, 42, 51, 60 in the comparison spreadsheet were the topics of questions directed to Candace.

The committee continued review and discussion of the comparison spreadsheet.

Row 40 – (line 42) Maria added the previous statement from Candace to spreadsheet regarding what is appropriate for TNI to address in its FAQs. Since TNI does not use the term "commercially available" in the TNI standards, Maria suggested the TNI FAQ should not address the topic of commercial availability, or it should be worded without that terminology, such as "what audit samples are available?" Maria will provide

Candace's response to this question so the committee can make a more informed decision. Richard also noted a link to the EPA website is provided in the TNI FAQs, so perhaps we don't need to add the question. Ray noted the questions that are most frequently asked are 1) who is approved as a provider and 2) what samples are available. Maria will propose some changes based on the discussion. EPA will have the definition of "commercially available" on their website and keep it updated.

Row 44 – The committee had further discussion about facility submittal of test plans/protocols. Maria proposed some potential changes to V1M3 section 4.1.1 and 4.2.1 in the comparison spreadsheet. Shawn suggested rewording it such that the facility follows what is required by their state program rather than the TNI standard dictating what is submitted. Ray thought this is similar to the previous discussion regarding the limitations to the TNI program. Ray thinks it comes across as TNI telling participants what they have to do, which may be outside of its role. The issue is defining what information the facility needs to provide to the provider in order to best identify the audit sample. Not every state will require a test plan, so we need reasonable guidance that recognizes differences between programs. Maria noted two options – changing the section or deleting the section in the TNI standard. The majority supported changing the section in a 5-2 vote (Maria and Ray support deletion of the section).

The group reviewed current requirements of V1M3 section 4.1.1. The intent is that both the regulatory agency and the provider get the information that they need. This section is about what the facility needs to do to order the audit sample. Ray asked if TNI can require the site specific test plan or is that a regulatory responsible. The regulator has the ultimate authority to bless the concentration in the SSAS. TNI should not try to specify that the facility has to submit a test plan but should focus on the criteria for selection of a test sample. Maria suggested that regulators discuss this topic off line and make a recommendation, including the figures in the standard. The committee will review again on the next call.

Row 58 – Shawn suggested the TNI requirements be aligned with EPA's proposed rule for the compliance test date. This would add sampling start date to the V1M1 section 11.2.2 parameters list. The start date is already in the SSAS database. The committee agreed to add "sampling event start date" as letter l). Stan asked about the proposed terminology, and what is most likely to be used in the field. A definition for the term should also be added to the standard (the regulators will also discuss/propose this).

Row 59 – The committee reviewed the proposed addition to V1M1 section 8.1 as item d). Shawn asked whether the regulatory agency needs to be cited in the proposed addition, since the regulatory agency doesn't know the assigned value either. Should we also add the laboratory as well? Maria noted that the lab is not referenced in this section. Richard suggested adding the new requirement to V1M1 section section 8.3 as an alternative. It was noted that V1M 3 requires that lab be identified to the provider in section 4.1.2. The proposed addition is "The provider shall not send the same audit sample twice to the same laboratory or facility." Do we need to include the tester as well? The definition of "facility" is inclusive of the tester. There is a need to keep the lab in as well since the facility could use multiple labs or multiple facilities can use same lab. All agreed it should reference the laboratory and facility but not the regulatory agency. Stan suggested that the committee also ask EPA for clarification of the overall intent of this requirement. Shawn explained that once a laboratory has received a sample, it won't get the same one again, so they are the one relevant recipient.

The next meeting is October 4, 2:30 pm EDT (to accommodate the prior EPA monthly teleconference).

1) Regulatory group action items
2) Questions from the committee to Candace