

TNI Stationary Source Audit Sample Expert Committee Teleconference  
May 2, 2011

Attendance:

Maria Friedman, Chair	Committee member	present
Mike Hayes	Committee member	absent
Michael Klein	Committee member	present
Gregg O'Neal	Committee member	present
Michael Schapira	Committee member	present
Jim Serne	Committee member	absent
Richard Swartz, Vice-chair	Committee member	present
Stanley Tong	Committee member	present
Ken Jackson	Program Administrator	present
Ty Garber	Associate member	absent
Shawn Kassner	Associate member	present
Mike Miller	Associate member	absent
William Mills	Associate member	absent
William Daystrom	Guest	present
Teresa Lowe	Guest	present
Paul Meeter	Guest	present

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

Maria asked the committee to confirm receipt of the documents e-mailed May 6 and 9, 2011. All confirmed receipt.

- 2) Review and approve minutes from teleconference on April 18, 2011

Gregg moved to accept the minutes, and Richard seconded. Six were in favor of the motion and one member (who had been absent from the meeting) abstained.

Maria also noted that the minutes from April 4 were approved by e-mail vote.

All action items from these two sets of minutes are complete except for Shawn's correction of the subcommittee's minutes from 4/14/10. Shawn agreed to deal with it this week.

- 3) Update from the chair.

The TIA on Section 4.1.3 V1M2 has been approved by e-mail vote. All 8 Committee members voted in favor.

The TIA on Section 5.1b V1M3 is posted on the website with a deadline for comments of May 9. If no comments have been received by the posting deadline, Maria will ask the Committee members to vote for the TIA by e-mail.

- 4) Continue discussions re. SSAS Table

Members again expressed concern over the term "well qualified laboratory" (see March 21, 2011 minutes). There was some discussion of this topic, but no further progress at

this time. It was also pointed out that the introduction of new methods may be a problem, since there will be no historical data to establish acceptance limits. This is not of immediate concern, since the Committee's priority is to deal with the current methods.

The Committee referred to Method 25, posted on the website ([www.nelac-institute.org/ssas/table/prop2011.php](http://www.nelac-institute.org/ssas/table/prop2011.php)). Shawn explained how the acceptance limits were derived. Concern was expressed over the wide acceptance limits at concentrations below 600 ppm, which would allow laboratories to produce poor data at these lower concentrations yet still pass the audit. Audit sample concentrations below 150 ppm produced very wide acceptance limits (the first 3 concentrations in the table on p. 5 were below this concentration). Michael Klein said that audits for Method 25 must go down to 50 ppm, as that is the minimum reliable detection limit according to EPA, and suggested getting more information from EPA on how this level was established. He added that if stack samples can be analyzed to this level, how can audits (which should be easier) not be analyzed to this level? He argued that when the method is performed properly, people can (and do) pass audits with the current acceptance criteria, even at low concentrations, as they have consistently done in NJ. Since Method 25 audits are unique and evaluate both the sampler and the laboratory, the fact that labs may fail is not necessarily an indicator that labs can't analyze the audits accurately; it is likely an indicator that samplers aren't collecting the samples properly. Paul Meeter added that samples have historically been analyzed down to 50 ppm.

Referring to the proposed acceptance criteria for Method 25 that employed a regression equation rather than a fixed +/- percent acceptance, Gregg suggested that the Committee could develop an Excel file that regulators could use to determine where the laboratory data fell in comparison to the acceptance limits and assigned value. This would give the regulator more information to gauge the validity of the analyses and the audit sample based on the sample concentration and the regression equation-based limits. The regulator could thus tell from the graphed data exactly how close the reported values were in relation to the acceptance criteria and assigned values, and could decide for itself the quality of the data provided by the audit sample.

Shawn suggested that if the Expert Committee would like the subcommittee to revisit the proposed acceptance criteria for method 25, they would do so even though he does not think they would change their recommendation. Maria said to first wait and see how the voting on the proposed table turns out before doing any further action.

The next method to be studied will be Method 29, and Maria asked everyone to look at the table and subcommittee comments on this method in preparation for the next call.

## **Adjournment**

The meeting adjourned at 3:55pm EDT. The next meeting will be May 16 from 2:00 – 3:30 pm EDT.