TNI Stationary Source Audit Sample (SSAS) Expert Committee Teleconference Meeting
October 21, 2013, 1400 hrs. EDT C.G. Simon

Attendance:

Maria Friedman – Chair TestAmerica (Laboratory)	Committee member	**Present**
Mike Hayes Linde (Provider)	Committee member	**Present**
Michael Klein New Jersey DEP (State Government)	Committee member	**Present**
Theresa Lowe CCI Environmental (Stationary Source Tester)	Committee member	**Present**
Paul Meeter Weston Solutions (Stationary Source Tester)	Committee member	Absent
Gregg O'Neal, North Carolina DAQ (State Government)	Committee member	**Present**
Michael Schapira Enthalpy (Laboratory)	Committee member	**Present**
Jim Serne TRC Solutions (Stationary Source Tester)	Committee member	
Stanley Tong EPA Region 9 (Federal Government)	Committee member	**Present**
Tom Widera ERA (Provider)	Committee member	**Present**
Bob O'Brien Sigma-Aldrich (Accredited Provider)	Committee member	**Present**
Mike Miller (member at large)	Associate member	Absent
William Daystrom TNI (Webmaster)	Guest	**Present**
Charles Simon, VOC Reporting, Inc. (Laboratory)	Guest	**Present**
Katie Strickland Element One (Laboratory)	Guest	**Present**
Rob Knake A2LA (Provider Accreditor)	Guest	**Present**

The meeting was called to order at 1409 hours EDT by the chair, Maria Friedman. There was a quorum present. Static on the phone lines prompted everyone to dial in again. Most lines were acceptable after the re-connection, but Rob Knake had to drop off the call due to the line static.

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

All present confirmed receipt of the documents (TNI SSASEC Teleconference Agenda for 10-21-2013.doc; TNI_SSASEC_Mtg_8-1-2013_draft.doc; SSAS Table Rev. 4_Effective 10-8-2013.pdf TNI SSAS WDS V1M1-Rev0.2 (Provider).pdf).

[2] Review and approve minutes from teleconference on October 8, 2013.

The minutes were reviewed. After one spelling correction was made, Gregg O'Neal moved to accept the minutes and Mike Hayes seconded the motion. The motion passed.

Maria Friedman told Katie Strickland that she needs to join TNI in order for her to forward the links to the committee application process. Katie responded that she will join TNI this week.

[3] SSAS Central Database update

William Daystrom reported the following updated statistics for the database to date:

- 517 reported audit sample results, up from 418
- 87 Regulator IDs issued, up from 81
- 111 Stationary Source Tester IDs issued, up from 99
- 57 Laboratory IDs issued, up from 52

William reported that 7 out of 20 Method-8 (SO2/SO3) samples failed. He could not say which labs had failed. The M-8 audit samples were in ampules. They had been analyzed by titration per the Method, as opposed to Ion Chromatography (IC) as allowed by the Method in the presence of strong interference.

Stanley Tong asked William how to reset his password, which was lost, and how long does it take? William responded that he would reset Stan's password today.

Charles Simon asked how we can tell if a lab used titration or IC for Method 8 sample analysis and which Method(s) do the Providers use? Bob O'Brien responded that Sigma does both titration and IC, but they certify with titration. Tom Widera responded that ERA certifies with weights and measures, and checks with IC. Bob clarified that Sigma also uses weights and measures to determine the audit sample concentrations then uses titration for verification analysis. Neither company adds interfering compounds to the Method 8 audit samples.

Katie reported that her company has had past problems with getting different analytical results for metals-on-filters Proficiency Testing (PT) samples when labs used different analytical techniques. These were not Method 8 samples, nor SSAS samples.

Maria said the TNI code for Method-8 analysis specifies titration. However, since the Method allows IC under certain conditions, there needs to be a place holder for the analytical method used on the audit sample report. This would cover situations where alternatives are allowed.

Providers are allowed to use different analytical methods because they have to meet different accuracy requirements. They are not limited to the Reference Method requirements.

Maria said we need to document the Method 8 failures. Gregg asked if the SO3 values were low. William said no. Michael Klein asked if the failures were in a particular lab or a particular State. William answered no, they are widely distributed. The acceptance criteria are dependent on sample volume, but based on one dry standard cubic meter (dscm) they are ±10% for concentrations over 20

mg/dscm, and ±15% for concentrations lower than 20 mg/dscm and the range of audit samples is 5-150 mg/dscm.

Tom said that Method 8 PT samples in past years have had only one failure out of 33 results in the 27-80 mg/dscm range. He concludes that the acceptance limits are attainable. Charles suggested that the high failure rate for this Method may be due to the large number of Stationary Source Tester in-house Laboratories that are analyzing the audit samples. Maria read the list of Laboratories that had failed the audits and Charles recognized all of them except one as Stationary Source Testers.

Charles stated that these data should serve the purpose of improving laboratory performance as these Testers will now either send the Method 8 samples to certified analytical Laboratories, or improve their in-house Laboratory performance substantially.

Michael Klein expressed concern that these bad data can pollute our 2-year review of acceptance criteria. Basing acceptance criteria on past performance rewards poor analysis with looser standards, especially considering that "well qualified tester" is not defined in the EPA regulations. He pointed to the Method 25 acceptance criteria as an example of this. Charles suggested that if this happens, we can change our review procedures since the entire program will be under review.

Discussion continued on the need to identify the analytical method used for each audit sample. Provider PT codes cannot be used since they are unique to each company and differ from the current TNI codes. Labs frequently put in the method they used in company-specific jargon. Maria asked if we can mandate the method to the Lab. The audit samples must be done by the same method as the Source samples.

Charles said that these issues will allow us to determine the best results for different allowed analytical methods. For example, Method 29 allows many different methods of spectroscopic analysis for the metals. We need to add a footnote to the SSAS Table that requires the Labs to unambiguously identify the method of analysis for each audit sample. For Method 8 it will be titration or IC. For other Methods they can use the TNI codes.

Michael Klein said this sounds like a good idea. Stan said this issue will require follow-up with Mike Schapira.

[4] Discuss TIA for multiple audits to the same Lab.

This TIA will lessen the burden on Providers and may encourage more companies to become Providers. Maria reminded everyone that the measure requires a 75% majority to pass.

Mike Schapira asked if this TIA will cover 2 audits when the requested concentration is the same (e.g., two stacks at the same location with the same permit requirements that are to be tested at the same time). Michael Klein clarified that in that instance, only one audit is required as allowed by the regulations. Tom said that ERA tracks the primary Lab and does not send out two of the same concentration audits. However, if another Lab is used as a sub-contractor, it could get the same audit sample concentration twice. The Lab that will perform the analysis needs to be specified before the audit sample goes out. Providers can't track sub-contracted Labs. Mike Schapira said this happened at Enthalpy.

This is a Provider problem. Charles said this needs to be noted and fixed. Tom said this could happen if two samples at 5 ppm were requested for different tests but eventually went to the same Lab. Charles asked if this violates the rules, or the spirit of the rules. Michael Klein stated we should never give the Requesters exactly what they ask for. He said that in New Jersey, the Regulators will request an approximate value representative for that test program but also different from what was requested, and the Provider will send something in that range.

Providers are allowed to ship what Facilities order unless another value is requested by the Regulator. This is in the regulations. Charles asked if we should be more specific in the regulations, and Gregg responded that this would be too restrictive for the Providers.

Maria reminded everyone that we chose to have the Providers report the actual concentrations of the audit samples after receiving the results. We can add some language to this section and send it to the members by email for comment. Gregg said that the purpose of the SSAS program was to have more than one Provider, so this guarantees that more than one lot of audit samples will be available. We do want the Labs to get the actual audit sample values so everyone will know how the Labs are doing. We can change the definition of a lot if needed.

Charles said that he would submit some language for the TIA to Maria and she will forward it to the committee members. Gregg said that Provider Accreditors would have to include any changes in their regulations. Maria said that Bill Hirt of ACLASS and Rob Knake of A2LA will be included in the email.

The next TNI-SSAS committee teleconference will be on November 4, 2013 at 1430 EST. The meeting was adjourned by the Chair at 1557 hours EDT.