

TNI Stationary Source Audit Sample Expert Committee Meeting with Teleconference  
August 5, 2013, 1530 hrs. CDT, San Antonio, Texas

**Attendance:**

Maria Friedman – Chair TestAmerica (Laboratory)	Committee member	<b>Present</b>
Mike Hayes Linde (Provider)	Committee member	absent
Michael Klein New Jersey DEP (State Government)	Committee member	absent
Theresa Lowe CCI Environmental (Stationary Source Tester)	Committee member	absent
Paul Meeter Weston Solutions (Stationary Source Tester)	Committee member	<b>Present</b>
Gregg O’Neal, North Carolina DAQ (State Government)	Committee member	<b>Present</b>
Michael Schapira Enthalpy (Laboratory)	Committee member	<b>Present</b>
Jim Serne TRC Solutions (Stationary Source Tester)	Committee member	absent
Stanley Tong EPA Region 9 (Federal Government)	Committee member	<b>Present</b>
Tom Waderra ERA (Provider)	Committee member	<b>Present</b>
Mike Miller (member at large)	Associate member	<b>Present</b>
William Daystrom TNI (Webmaster)	Guest	<b>Present</b>
Kevin Hollbrooks JEA (Stationary Source)	Guest	<b>Present</b>
Charles Simon, VOC Reporting, Inc. (Laboratory)	Guest	<b>Present</b>
Rob Knake A2LA (Provider Accreditor)	Guest	<b>Present</b>
David Elam Summa Consultants, Inc.	Guest	<b>Present</b>
Bob O’Brien Sigma-Aldrich (Accredited Provider)	Guest	<b>Present</b>
Carl Kircher Florida DOH (State Government)	Guest	<b>Present</b>
William (Bill) Hirt ACLASS (Provider Accreditor)	Guest	<b>Present</b>
Katie Strickland Element One (Laboratory)	Guest	<b>Present</b>
Ken Smith Element One (Laboratory)	Guest	<b>Present</b>

The meeting was called to order at 1330 hours CDT by the chair, Maria Friedman, in the Hyatt Regency Riverwalk Hotel in San Antonio Texas. There was a quorum present.

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

All present confirmed receipt of the documents ([TNI SSAS Standard V1M1-Rev0.2 \(Provider\).pdf](#) [TNI SSASEC Teleconference Agenda for 8-5-2013.doc](#) [SSAS Committee Charter 2013 8-5-2013.pdf](#) [TNI SSASEC Mtg 7-23-2013 draft.doc](#)).

Maria reported that Tom Waderra has been formally approved by TNI as a voting member of the SSAS committee, and Bob O'Brien has been accepted by the committee to be a voting member and is awaiting nomination and approval by TNI. Maria also reported that Shawn Kasner has to step down as chair of the SSAS Table sub-committee and recommends Carl Kircher as a good resource. Also, there still is no vice chair for the committee. Maria will ask all members by e-mail and if there is no volunteer by the end of August, or by our next meeting, she will appoint a member as the vice-chair.

[2] Review and approve minutes from teleconference on July 23, 2013.

Stan clarified that he wanted to send the SSAS web site user sign-up forms to all states in his EPA Region IX. It was also pointed out that there are only three pages, not five, in the minutes, and there was one typo in the section on William's summary, "up from 16". A vote was called for and seconded to approve the 7/23/13 minutes with these corrections. The minutes were approved with the changes.

[3] Discuss/vote on Committee Charter

Everyone present had reviewed the updated Charter. Paul Meeter moved to approve the Charter and Mike Schapira seconded the motion. All members present voted in favor of approval. Maria will send the new Charter to TNI for posting on the website.

[4] SSAS Central Database update

William reported the following updated statistics for the database so far:

- 97 reported audit sample results combined for Method 6 (SO<sub>2</sub>), Method 8 (SO<sub>3</sub>), Method 13b (F<sup>-</sup>), Method 26 (HCl and HF), Method 29 (metals)
- 55 regulator IDs issued
- 39 stack tester IDs issued
- 28 laboratory IDs issued

[5] Discuss TNI SSAS Standard, Volume 1, Module 1

Most questions from members and guests concerned Section 8 of the regulation, "Ordering and Reporting Instruction". It was suggested that 8.1 be changed to read "The Provider shall receive an audit sample order from a Facility or its authorized representative". This would clarify the stack tester's role as the entity that actually orders the audit sample as authorized under Section 3.4. It

was also suggested that we change Section 3.4 to read “**Facility:** The responsible owner or operator for the stationary source or ~~their~~ its authorized representative.”

It was clarified during the discussion that, under Section 8.1, Regulators have 15 days to approve an audit sample order and if they are mute the order will be processed as received. Regulators would have no grounds to object to the selected audit sample after the fact, even if the audit sample and stack sample concentrations are widely disparate, as may happen. It is up to the laboratory to create a single calibration that encompasses the entire range of audit and stack sample pollutant concentrations. Laboratory representatives agreed on this point. Mike Miller pointed out that this is the program that EPA approved, so Regulators have no choice.

Carl Kircher noted that the SSAS Table is reflective of the old audit program in that it authorizes the Regulator to discuss the audit sample and make changes prior to approval. It may be a good idea to include paperwork with the audit sample that clearly shows the authority.

Stan Tong and Greg O’Neal said that EPA gives information to Regulators on a monthly scheduled teleconference and the community is aware of the authority. Carl Kircher suggested that Module 1 be added to the audit sample paperwork, which could be electronic. It was also pointed out that Section 8.1 authorizes the Regulatory Agency to have the audit sample sent to them instead of elsewhere.

There was a discussion on the timing of the audit sample ordering and receiving process and the inherent delays it introduces to the compliance testing community. From day zero, the day the Facility authorized representative orders the audit sample, the Provider has 3 days to notify the Regulator, and then the Regulator has 15 days to respond. So, after 18 days the audit sample production and shipping operation commences. It was noted that time “zero” resets if the audit sample concentration is changed.

There was general agreement that these changes and time delays must be accommodated by both the source testing community and the regulated emission sources. No changes were suggested to the current rules regarding timing.

The question was asked if audit samples can be ordered for non-compliance purposes. Bob O’Brien of Sigma-Aldrich answered that a proficiency test (PT) sample or a quality control (QC) sample can be ordered with the exact same composition as an audit sample but it could not bear the same designation since it would not be for a compliance test.

It was pointed out that the Regulator has the final say on the validity of a compliance test, even when an audit sample fails.

It was noted that under Section 8.2.b.2, the laboratory is required to analyze the audit sample under the same calibration as the source samples. Paul meter stated that the lab just has to calibrate for the entire range.

The next TNI-SSAS committee teleconference will be in Sept, 2013 and will focus on a continued review of the SSAS standards in Volume 1, Module 1, and then going on to Volume 1, Module 2 . Members were asked to review these modules and have comments ready prior to the next meeting.

The meeting was adjourned by the Chair at 1703 hours CDT.