

TNI Stationary Source Audit Sample Expert Committee Teleconference Meeting
September 23, 2013, 1400 hrs. EDT

Attendance:

Maria Friedman – Chair TestAmerica (Laboratory)	Committee member	Present
Mike Hayes Linde (Provider)	Committee member	absent
Michael Klein New Jersey DEP (State Government)	Committee member	Present
Theresa Lowe CCI Environmental (Stationary Source Tester)	Committee member	absent
Paul Meeter Weston Solutions (Stationary Source Tester)	Committee member	Present
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	Present
Stanley Tong EPA Region 9 (Federal Government)	Committee member	Present
Tom Widera ERA (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
Bob O’Brien Sigma-Aldrich (Accredited Provider)	Guest	Present
Rob Knake A2LA (Provider Accreditor)	Guest	Present

The meeting was called to order at 1404 hours EDT by the chair, Maria Friedman. 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 9-23-2013.doc](#), [TNI SSASEC Mtg 9-9-2013 draft.doc](#)).

[2] Review and approve minutes from meeting and teleconference on September 9, 2013.

Two minor corrections to the minutes were made. One typo, change “up from 97” to “up from 55”, and a total of 3 pages, not 4. Mike Schapira motioned to accept the minutes with corrections, Jim Serne seconded the motion. A roll call vote resulted in passage of the amended minutes from the 9/9/13 meeting.

[3] SSAS Central Database update

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

- 394 reported audit sample results, up from 324 (The individual results were contained in a total of 107 audit report uploads, up from 97.),
- 75 Regulator IDs issued, up from 67,
- 87 Stationary Source Tester IDs issued, up from 76,
- 48 Laboratory IDs issued, up from 45.

Jim Serne wanted to know how many of the audit samples passed. William had not compiled that information. Maria said that we will begin compiling pass/fail statistics by method and include them in the Database updated statistics for the next meeting

Maria had received comments by e-mail describing problems encountered with the SSAS Program. Michael Klein raised several issues. Results already submitted to the SSAS Central Database have to be recalled due clerical errors. Regulators can ask Laboratories directly about audit results. We need a procedure for recalling errors. Maria responded that there is a “Data Revision Request Form” to be filled in by the Providers to recall and replace results that have been already submitted. This form must be completely filled in and sent to William Daystrom (Webmaster). The Regulator must have been contacted along with the Laboratory, the Stationary Source Tester, and the Provider before filling the request. The form must include all of the ID numbers of the participants and the reason for revision. Follow the instructions for completion of the form. The “Data Revision Request Form” can be found on the TNI website.

Another issue raised by Michael Klein is that Regulators receive evaluations from Providers before receiving the complete set of sample and audit results from the Laboratory. We need to make Laboratories aware that they need to report both the audit and sample analytical results to the Regulator at the same time. This prevents changes in the final report. This only needs to be done for sample results that have an associated audit result. Even if the audit fails, the Source must still report the test results, even if the test shows non-compliance.

We need to have an outreach to Stationary Source Testers about the rules of the SSAS Program. Charles Simon said he may be able to give a presentation at the next Source Evaluation Society meeting in March 2014.

Maria reminded everyone that the standards require that a Regulator be contacted and given 15 days to respond before an audit sample can be sent out. This requirement is in the regulations and is approved by EPA. Maria will forward an e-mail from Michal Klein to Tom Widera and Bob O’Brien that contains the wording and reference for this authority.

Maria also re-iterated to the group that any changes we make in the standards must be approved by EPA.

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

Tom Widera and Bob O'Brien both agreed that the wording in Section 8.1.a is sufficient and that they will address the issue of creating more acceptable tamper-proof seals internally at each company. Tom's company will continue to send liquid samples in screw-top bottles with shrink-wrap seals, and they are looking into better seals for the petri dishes containing filter samples. If specific sealing methods are wanted, they must be explicitly described in the Standard. Rob Knake agreed.

Jim Serne pointed out that sealed glass ampules containing liquids can break if exposed to cold temperatures due to freezing. Providers will need to take precautions if using this type of packaging. Charles pointed out that ampules with 20% or more headspace would not break if the liquid froze, only ampules that are full or nearly full will break when the water based liquid freezes and expands.

Rob Knake said that A2LA approved both ampules with headspace and screw top vials with shrink wrap for water and solvent based samples, along with filters in vacuum sealed bags.

Mercury filter samples were not approved by EPA due to insufficient historical data, so they are not currently required even though they are available from Providers. Historical data can be created from the currently available mercury filter audits, but States must require their use in order to generate such data, even though they cannot fail an emission test due to a failed mercury filter audit. Members agreed that the mercury filter audit data will not be generated if there is no requirement from an authority to do so.

Maria pointed out that the mercury filter audit is not in the March 2013 version of the SSAS Table, even though it does appear in earlier versions. Maria will add a footnote to the Table clarifying that the Mercury filter audit is not required by EPA, but the mercury impinger audit is required.

The issue of not sending the same audit sample twice to the same Laboratory will be a topic of our next meeting

The next TNI-SSAS committee teleconference will be on October 8, 2013 at 1400 EDT. The meeting was adjourned by the Chair at 1510 hours EDT.