



July 13, 2004

**MEMBER COMPANIES**

Dow Chemical U.S.A.  
Eastman Chemical Company  
Eastman Kodak Company  
Eli Lilly and Company  
Lafarge Corporation  
3M  
Onyx Environmental Services, LLC  
Syngenta Crop Protection, Inc.  
Von Roll America, Inc.  
Washington Demilitarization Co.

**ASSOCIATE MEMBERS**

Alta Analytical Perspectives LLC  
B3 Systems  
Blue Ridge Chemicals  
CEntry Constructors & Engineers  
Compliance Strategies & Solutions  
Cook-Joyce, Inc.  
Engineered Spiking Solutions, Inc.  
ENSR  
Focus Environmental, Inc.  
Franklin Engineering Group, Inc.  
Metco Environmental, Inc.  
RMT, Inc.  
SAFRISK, LC.  
Severn Trent Laboratories, Inc.  
Sigrist-Photometer AG  
URS Corporation

**INDIVIDUAL MEMBERS**

Ronald E. Bastian, PE  
Ronald O. Kagel, PhD

**ACADEMIC MEMBERS**

(Includes faculty from:)

Colorado School of Mines  
Cornell University  
Lamar University  
Louisiana State University  
Mississippi State University  
New Jersey Institute of Technology  
Princeton University  
Rensselaer Polytechnic Institute  
University of Arizona  
University of California – Berkeley  
University of California – Los Angeles  
University of Dayton  
University of Illinois at Chicago  
University of Kentucky  
University of Maryland  
University of Utah

OAD Docket  
Environmental Protection Agency  
Mail Code B102  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Attn: Docket No. OAR-2004-0022

When the Coalition for Responsible Waste Incineration (CRWI) submitted their original comments on the proposed rule National Emission Standards for Hazardous Air Pollutants: Proposed Standards for Hazardous Air Pollutants for Hazardous Waste Combustors (Phase I Final Replacement Standards and Phase II) (69 Fed. Reg. 21198, April 20, 2004) on July 6, 2004, there were several inadvertent errors in Appendix A. Enclosed is a corrected copy of that Appendix. Please replace the original appendix with the enclosed revised one.

Thank you. If you have additional questions, please contact us at 202-452-1241 or [crwi@erols.com](mailto:crwi@erols.com).

Sincerely yours,

Melvin Keener, Ph.D.  
Executive Director

cc: CRWI Board  
Jim Berlow, EPA  
Hugh Davis, EPA  
Mike Galbraith, EPA

---

1752 N Street, NW, Suite 800  
Washington, DC 20036  
Phone: 202 452-1241  
Fax: 202 887-8044  
E-mail: [crwi@erols.com](mailto:crwi@erols.com)  
Web Page: <http://www.crwi.org>



Appendix A - Revised

<b>EASTMAN CHEMICAL COMPANY</b>							
<b>Project Cost Summary - ISBL ONLY</b>				<b>Order of Magnitude Estimate +100%;-50%</b>			
<b>Project Title:</b> SDA FOR FLUE GAS - NEW STRUCTURE							
<b>Project Name:</b> SCRUBBERS FOR BOILERS 23 AND 24				<b>Scenario Name:</b> BOILERS 23 AND 24			
<b>Proj. Location:</b> KINGSPORT, TN				<b>Job No:</b> BOILERS		<b>Prep. By:</b>	
<b>Estimate Date:</b> 20MAY04 11:30:43				<b>Est. Class:</b> FORECAST		<b>Currency:</b> DOLLARS USD	
Account	MH	Wage Rate	Labor Cost	Matl Cost	Total Cost	Percentages	
(2) Equipment	2,564	32.00	82,043	5,421,200	5,503,243	43.1% of TDC	
(3) Piping & Ductwork	27,706	32.00	886,583	2,046,524	2,933,107	23.0% of TDC	
(4) Civil	33,531	32.00	1,072,997	75,429	1,148,426	9.0% of TDC	
(5) Steel	9,256	32.00	296,182	823,830	1,120,012	8.8% of TDC	
(6) Instruments	2,393	32.00	76,583	622,597	699,180	5.5% of TDC	
(7) Electrical	3,412	32.00	109,186	324,966	434,153	3.4% of TDC	
(8) Insulation	10,505	32.00	336,174	531,835	868,009	6.8% of TDC	
(9) Paint	1,896	32.00	60,668	10,941	71,608	0.6% of TDC	
<b>Total Direct Field Costs</b>	<b>91,263</b>		<b>2,920,417</b>	<b>9,857,322</b>	<b>12,777,739</b>	100.0% of TDC	
	(TDMH)		(TDL)	(TDM)	(TDC)		
<b>Indirect Field Costs</b>	<b>3,403</b>				<b>1,103,565</b>	37.8% of TDL	
	(IFMH)				(IFC)		
<b>Total Field Costs</b>	<b>94,666</b>				<b>13,881,304</b>	55.5% of TIC	
	(TFMH)				(TFC)		
Freight					250,000	2.5% of TDM	
Contractors LSTK Profit					1,500,000	11.7% of TDC	
Engineering and HO	43,200				3,631,400	14.5% of TIC	
Eastmqn Project Team	4,800				576,000	2.3% of TIC	
Contingency					5,161,296	20.6% of TIC	
<b>Total Non-Field Costs</b>	<b>43,200</b>				<b>11,118,696</b>	44.5% of TIC	
	(HOMH)						
<b>Project Total Costs</b>					<b>25,000,000</b>	195.7% of TDC	
					(TIC)		

NOTE:

The area at the South end of B-83 near #24 boiler is too small to accommodate this equipment. The maintenance shop to the South of B-83 is assumed to be demolished and that steel structures can be built above the railroads that can hold the auxilliary equipment. The bag house and the SDA will require area on the ground. The design scheme is assumed to be similar to that on boiler #30 at B-325 but smaller in size.