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The Coalition for Responsible Waste Incineration (CRWI) appreciates the opportunity to submit comments on *EPA Method 23 – Determination of Polychlorinated Dibenzo-p-Dioxins and Polychlorinated Dibenzofuran from Stationary Sources*; Proposed rule. 85 FR 2,234 (January 14, 2020). CRWI is a trade association comprised of 28 members representing companies that own and operate hazardous waste combustors and companies that provide equipment and services to the hazardous waste combustion industry.

Attached are specific comments on the proposed requirements.

Thank you for the opportunity to comment. If you have any questions, please contact me at (703-431-7343 or mel@crwi.org).

Sincerely yours,

Melvin E. Keener, Ph.D.
Executive Director

cc: CRWI members
R. Merrill, EPA

Specific comments

1. CRWI supports expansion of target analytes.

Changes in Sections 1.1 through 1.4 expand the Method 23 scope of target analytes to include PCBs and PAHs. Concurrent sampling and analysis of these similar target compound groups is an exceedingly useful and important change. CRWI supports this modification. The associated Federal Register text affirms the usefulness of this change: “.....and will provide flexibility to stack testers and analytical laboratories who measure semivolatile organic compounds (SVOC) from stationary sources while ensuring that the stack testing community can consistently implement the method across emissions sources and facilities.” However, the modified Method 23 text as presented in the *Federal Register* seems to limit the scope of the change to compounds analyzed via HRGC/HRMS and does not include discussion or reference to other SVOC beyond dioxin/furan, PCBs, and PAHs. Specifically, there is no discussion of other SVOC target analytes generally analyzed by GC/MS, SW-846 Method 8270. In fact, many of the PAH compounds noted in the suggested Method 23 modifications comprise a subset of the typical Method 8270 target analytes. Combined sampling and analysis of high-resolution and normal (or low-) resolution GC/MS target analytes has been performed historically and successfully. This further expansion of the Method 23 scope would be an equally useful and important change. CRWI suggests EPA make the changes to incorporate other SVOC and reissue the revised text for a second review and comment period.

2. CRWI supports eliminating methylene chloride rinse.

In Sections 4.2.3 and 4.2.4, Method 23 currently requires two field rinses during sample recovery. The first is an acetone rinse followed by a methylene chloride rinse. The second is a toluene rinse followed by a methylene chloride rinse. In new Sections 8.2.7 and 8.2.7, EPA is proposing to remove the methylene chloride rinses in the sample recovery process. Analysis by the Agency, stack testing companies, and laboratories have shown that the acetone and toluene rinses are adequate to recover the dioxins and furans in the sample. Removing the methylene chloride rinse will minimize field personnel’s exposure to a suspected carcinogen without impacting the recovery of dioxin and furan in the samples. CRWI supports this modification.

3. CRWI supports removing the requirement in 40 CFR 63.1208(b)(1) for administrator’s approval to use Method 23.

CRWI supports the proposed changes to the regulatory language in 40 CFR 63.1208(b)(1) to remove the requirement for administrator’s approval before being able to use Method 23 to measure dioxins/furan emissions from hazardous waste combustors. In 1999 (64 FR 52,828, September 19), EPA required hazardous

waste combustors to use Method 0023A. The logic at that time was that the revisions to 0023A had been made to improve the method but those improvements had not been made to Method 23. In the 2005 revisions to the hazardous waste combustor rule (70 FR 59,402, October 12), EPA allowed the use of Method 23 in circumstances where the enhanced procedures in 0023A would not increase the measurement accuracy. With the proposed modifications to Method 23, the original reason for requiring administrator approval no longer exists. CRWI supports the proposed revision to 40 CFR 63.1208(b)(1).

4. CRWI supports adding Method 23 as an alternative to SW-846 Method 0023A in 40 CFR 266.104.

CRWI also support the proposed addition of Method 23 to the regulatory language in 40 CFR 266.104(e)(1). When 40 CFR 266.104 was originally promulgated (February 21, 1991, 56 FR 7.134), Method 23 was required to measure dioxin/furan emissions. In 1997 (62 FR 32,452, June 13), EPA changed this requirement to Method 0023A as a part of Update III of SW-846. Although the preamble to the 1997 action does not discuss this, it is presumed that the reason for changing the method was the same as was used to justify Method 0023A in the 1999 hazardous waste combustor MACT rule. Given the proposed revisions to Method 23, it makes sense to add this method as an option for facilities regulated under 40 CFR 266. CRWI supports adding Method 23 to 40 CFR 266.104(e)(1).