January 9, 2017

Texas Commission on Environmental Quality
Waste Permits Division
Industrial and Hazardous Waste Permits Division
12100 Park 35 Circle
Austin, TX 78753

Attn: Mr. Will Wyman

The Coalition for Responsible Waste Incineration (CRWI) appreciates the opportunity to submit comments on TCEQ's draft CPT/RCRA Test Report Format. CRWI is a trade association comprised of 24 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 draft format.

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

Sincerely yours,

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Executive Director

cc: CRWI members

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General comments

CRWI members do not have any comments on the plan cover sheet of the plan checklist. However, we have a number of concerns on the test report format.

Over the years, CRWI members have streamlined their test reports to minimize duplicated information and to clearly present the required information. Depending on member preferences, we may also include other things in the report such as executive summary, regulatory history, or other items that are required for the report to serve as a Notice of Compliance.

On the other hand, we understand that TCEQ probably receives reports that are hard to follow, have missing information, or have information buried where it's difficult to find. We support the idea of submitting a complete report. However, facilities that are doing things right should not be penalized because others write incomplete or poorly organized reports. The draft report format TCEQ has proposed would be useful as a guideline, but it should not be mandatory and is far too prescriptive.

In general, CRWI believes that the report outline is too detailed. While the general outline lines up somewhat with a number of our member's standard report format and with the required Louisiana report format, the breakdown within each section are too structured to apply to any one facility. For example, the 3.0 Operating Parameter Data section has a number of unnecessary subsections. In our typical reports, this section is broken down by condition, and not by parameters. We often have one simple operating data table for each condition. We have subsections that might describe the spiking that was performed or might show the calculations we did to determine POHC, ash, chlorine, and metal feed rates. We believe that it makes more sense to organize this information by condition, not by operating parameter. For the Louisiana reports, members currently break up the one operating data table into a number of small tables to fit into their outline. This does not allow for a good narrative of what actually happened during the test.

In addition, should TCEQ keep the proposed format, there are several redundant sections that seem to require multiple presentations of the same data. This would cause the main report to double in size.

In summary, we believe that the proposed test report format would create more problems than it would solve, especially for those facilities that are already submitting complete reports. However, we recognize the need for the Agency to be able to quickly determine whether a report is complete. To resolve both of these concerns, CRWI suggests that the Agency develop a checklist similar to what was issued in TCEQ's Administrative and Technical Evaluation Checklist for the RCRA Part B Application (TCEQ-00136, Rev. 08-31-15). This would allow facilities to use their current format (which makes sense to them) and allow TCEQ to quickly check for completeness and changes. The Agency could retain the test format as guidance for those that wanted to use it.

In addition, CRWI has a number of specific comments on the draft guidance that should be addressed whether it is kept as guidance or as a requirement.

Specific comments

If the report format is required, deviation from the reporting format should not constitute a Notice of Deficiency. We believe that this should be reserved for substantive issues, not clerical issues.

Section 6

Section 6 is confusing. It is labeled as "Hazardous Waste Permit Based Results" which we assume is the RCRA permit results portion. As proposed, this section requires operating conditions, sampling procedures, feed stream and stack results, etc. As proposed, it will require that almost everything presented in Sections 3-5 be duplicated. Most of our members run RCRA tests simultaneously with the MACT tests because both are sampled and analyzed with the same sampling trains and methods. Having a separate section is redundant. Some members have prepared a separate summary table for RCRA parameters in the Summary Section (Section 1) and presented all the supporting data together since it is a combined test. The proposed structure would require that stack testers split their report into sections 4 and 5. Under our current method, members simply insert the entire stack test report into a single location. The proposed structure would require dividing the feed stream data into two parts as well.

We suggest that Section 6 be titled a summary of Hazardous Waste Permit Based Results and have summary tables of the RCRA pertinent emissions. The summary tables could include references to where the supporting data tables are located in TCEQ Section 3-5.

Section 7

Other than the very prescriptive aspects, the major comment with regard to the CPT report format was the redundancy of much the same QA/QC information being provided three times: in Section 7.0 of the CPT report; in Appendix D; and in the TCEQ QA/QC checklist (Appendix M). Our preference would be for a QA/QC summary discussion section and the completed TCEQ QA/QC checklist be included in the main body of the report. Section 7.0 should be limited to a discussion of any data quality objectives (DQO) that may have been exceeded or missed, and the impacts, if any, on the data quality for purposes of making regulatory determinations.

This section seems to be asking for a presentation of very detailed information on QA/QC which is normally part of the CPT QA Project Plan (QAPP). The QAPP is submitted as part of the CPT Plan a year in advance. A typical QAPP for our work is 100 pages long without any data. The idea of submitting a QAPP for approval in

advance is that you then only have to present deviations or changes in the actual report. Further, the individual QA/QC data is presented in the lab reports themselves along with a narrative from the labs describing any deviations. In the past, CRWI members have summarized any significant deviations in the main report, but did not make separate tables with all the precision, accuracy, and calibration data. All that information is in the lab reports. Putting the same information in two or more places in a report does not make the report any better, only makes it longer. We do not see the purpose of having such redundant information in the test report and suggest it be removed from the guidance.

We suggest that Section 7 QA/QC be a summary of the data review, a summary of any deviations from the approved QAPP, and any changes made in key personnel, procedures or equipment since the QAPP was approved. Section 7 should also include a copy of the lab accreditation and the TCEQ checklist. Everything else can be found by referencing the QAPP which should be included as an appendix (in electronic format). The TCEQ checklist will show where to find all the data, calibrations, etc.

Should TCEQ require all of the QA/QC procedure, descriptions of personnel, objectives, detection limits reporting and determination, calibration procedures and results, and all analytical equipment used, in addition to the checklist, Section 7 could easily become 200 pages or more in length, and be redundant with information in the QAPP and lab reports. It should be noted that there is already a requirement for a detailed narrative be prepared by the lab and included with each lab report.

Appendices

- In general, we believe that using a set list of appendices disrupts the flow of the document. Our preferred method would be to arrange the appendices based on order of when the data is discussed in the text.
- Appendix A, Stack Sampling Report: Calibration records for the sampling equipment (dry gas meter, thermocouples, analytical balance, pitot tube inspection, CEMS calibration gas certificates, etc.) is missing.
- Appendix D, QA/QC Data Report: We suggest deleting this appendix. Most of data in this outline is identified with regard to location within the Analytical Data Package (ADP) in the TCEQ QA/QC checklist. Data with regard to laboratory instrument calibrations should be deleted as this information is already provided in the ADPs.
- Appendix I, Analytical Data Packages: Preference would be to provide the full ADPs entirely on CD. If a hard copy is required, we would prefer to provide only the analytical summaries. Some data packages, especially for organics, are hundreds of pages (as many as 3,000 to 4,000 for dioxins/furans).
- Appendix E and J - They have separate CEMS and CMS Performance Evaluation Test reports. We do not understand why these need to be separate appendices. This is done as one report in every other state.

- Appendix L – This information is redundant and should be dropped. Resumes are already requiring in the QAPPs. There is no need to repeat them.
- Appendices D and I are redundant with respect to the QA/QC Data Report and the Analytical Data packages. The analytical data packages for the waste feed and emission data include both the QA/QC and the raw data, e.g. chromatograms, run logs, etc. It appears that TCEQ is asking for all raw data to be presented twice (Appendix D bullet 3) and Appendix I.
- Appendix A for stack sampling report and Appendix E (CEMs data) are normally in one report from the stack testers. It would be difficult to divide the results for air emission and CEMS into two reports. Either Appendix A should include the CEMS data and Appendix E eliminated as a standalone appendix, or we will need to have the stack testers produce 2 reports. It should be noted that in the main report Section 5 includes both the air emissions data and the CEMS data.
- The TCEQ checklist is required in Appendix M and also in main report Section 7.12. We see no reason for including this list two times.

Finally, we would suggest that the Agency make it clear that the main report would be submitted hard copy with the appendices and analytical data packages entirely on CD.