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Air and Radiation Docket and Information Center (6102)
US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attn: Docket number A-2001-02

The Coalition for Responsible Waste Incineration (CRWI) is pleased to submit comments on the proposed amendments for the National Emission Standards for Hazardous Air Pollutants for Source Categories: General Provisions; and Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Sections 112(g) and 112 (j) (66 FR 16318, March 23, 2001). CRWI represents 23 companies with hazardous and solid waste combustion interests. These companies account for a significant portion of the U.S. capacity for hazardous waste combustion. In addition, CRWI is advised by a number of academic members with research interests in hazardous waste combustion. Since its inception, CRWI has encouraged its members to reduce the generation of hazardous waste. However, for certain hazardous waste streams, CRWI believes that combustion is a safe and effective method of treatment, reducing both the volume and toxicity of the waste treated. CRWI seeks to help its member companies both to improve their operations and to provide lawmakers and regulators helpful data and comments.

CRWI has developed comments on two specific areas of the proposed amendments.

1. CRWI supports the concept of changing the deadline for requesting an extension of the compliance date from one year to 120 days before the compliance date. The current requirement of submitting a request for extension a year prior to the compliance date will result in numerous requests for extension that may not be needed.



A facility may be forced to request an extension because it simply does not know whether it will be able to meet the deadline or not. The proposed change would help remedy this problem. In addition, other MACT rules (e.g., the hazardous waste combustor MACT rule, see section 63.1213(b)) use the "12 months before the compliance date" language as a deadline for extension requests. CRWI suggests that the Agency modify this and other MACT rules to reflect current thinking on the issue.

2. Based on the preamble language (66 FR 16331), it appears that EPA intended to replace the daily zero and span check requirement for CPMS with an internal system check. While EPA's stated intent in the preamble is to clarify 63.8(c)(6) with this addition, CRWI does not believe that the proposed regulatory language accomplishes this. We read the current proposed language to say that CPMS must do the zero and span check, since CPMS are a subgroup of CMS. The zero and span checks are only appropriate for the CEMS and COMS and not CPMS. However one small change in the regulatory language would accomplish this. CRWI suggests changing the two "CMS" to "CEMS and COMS" in the first sentence of 63.8(c)(6). This would clarify the differences between CEMS, COMS, and CPMS requirements. CRWI believes that this change would translate the intended requirements into the regulatory language.

The changed language would be as follows:

- (6) The owner or operator of a CEMS and COMS ~~CMS~~ installed in accordance with the provisions of this part and the applicable CEMS and COMS ~~CMS~~ performance specification(s) shall check the zero (low-level) and high-level calibration drifts at least once daily in accordance with the written procedure specified in the performance evaluation plan developed under paragraphs (e)(3)(i) and (ii) of this section. The zero (low-level) and high-level calibration drifts shall be adjusted, at a minimum, whenever the 24-hour zero (low-level) drift exceeds two times the limits of the applicable performance specification(s) specified in the relevant standard. The system must allow the amount of excess zero (low-level) and high-level drift measured at the 24-hour interval checks to be recorded and quantified whenever specified. For COMS, all optical and instrumental surfaces exposed to the effluent gases shall be cleaned prior to performing the zero (low-level) and high-level drift adjustments; the optical surfaces and



instrumental surfaces shall be cleaned when the cumulative automatic zero compensation, if applicable, exceeds 4 percent opacity. The CPMS must be calibrated prior to use for the purposes of complying with this section. The CPMS must be checked daily for indication that the system is responding. If the CPMS system includes an internal system check, results must be recorded and checked daily for proper operation.

Thank you for the opportunity to comment on these proposed rules. If you have any questions, please contact me (202-452-1241 or crwi@erols.com).

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Melvin E. Keener', written in a cursive style.

Melvin E. Keener, Ph.D.
Executive Director

cc: CRWI Members