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Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460

Attn: Docket ID no. EPA-HQ-OLEM-2018-0305

The Coalition for Responsible Waste Incineration (CRWI) appreciates the opportunity to submit comments on *Guidance for Applicants Requesting to Treat/Dispose of PCBs Using Incineration or An Alternative Method: A Walk-Through of the Application Process*. This document was released on EPA's website on December 12, 2018. CRWI is a trade association comprised of 26 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 guidance document. These comments are based on the redline/strikeout version of the document that was posted in the docket (Docket ID No. EPA-HQ-OLEM-2018-0305-0003).

Thank you for the opportunity to comment on this proposed guidance 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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Specific comments

1. The draft guidance appears to only allow the use of Method 0023A to measure emissions of dioxins and furans. There are a couple of typographical errors that make this determination confusing. For example, in Table 3 (page 35), the method is listed as 0023. There is also a typographical error in Table C-1 (page 125) where it is listed as Method 0023a. We assume these are inadvertent and all should be Method 0023A. If these are typographical errors, the document does not allow the use of Method 23 as an alternative. We request that the Agency add the possible use of Method 23 in the final document. Both methods measure dioxins and furans. However, Method 0023A requires that the front half of the train be analyzed separately from the back half of the train. If a facility is required to use Method 0023A, they incur twice the analytical cost for every test run. When showing compliance using Method 0023A, the results from the front half and back half are added together, giving the same results as Method 23. Thus, for all practical purposes, Method 23 and Method 0023A are equivalent. EPA's Measurement Technology Branch made this same determination in 2010 in a letter to ARI Environmental, Inc., where they stated that "Method 23 is equivalent to SW-846 Method 0023A" (see ALT 065, <https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods>).

There may be circumstances where Method 0023A is preferred but for most cases Method 23 is adequate to show compliance at a lower cost. We see no reason why the guidance should not include the option to use both methods. Should the Agency choose to do so, they will need to add a definition on page xv, modify Table 3 (page 35), and Appendix C sections C.3.5 (page 123) and C.4.2 (page 130).

2. Should the Agency agree to add Method 23 as an alternative method, we also suggest that the guidance include a reference to ALT 052 (same reference as above) which allows the substitution of a toluene rinse and a combination of the acetone and toluene rinses into one sample prior to extraction and analysis. Here the measurement branch found that "toluene recovery rinses are as effective as methylene chloride rinses and do not significantly change the amount of dioxins and furans recovered from the sampling equipment." Given the current concerns on the use of methylene chloride, we see no reason to expose stack testing personnel to that chemical when a safer alternative is available and equivalent. Adding a reference to ALT 052 in the guidance document would make it easier for companies to use this alternative.
3. On page 51, DQOs (data quality objectives) is defined twice. Only one is needed.