Coalition for Responsible Waste Incineration

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William J. Clinton (WJC) West Building
U. S. Environmental Protection Agency
Mailcode: 2822T
1200 Pennsylvania Ave, NW
Washington, DC 20460

Attn: Docket ID No. EPA-HQ-OAR-2013-0696

The Coalition for Responsible Waste Incineration (CRWI) appreciates the opportunity to submit comments on *Performance Specification 18 – Specifications and Test Procedures for Gaseous HCl Continuous Emission Monitoring Systems at Stationary Sources*. 79 Fed. Reg. 27,690 (May 14, 2014). CRWI is a trade association comprised of 26 industry members.

CRWI is submitting comments on four specific areas. These are:

1. Method 26 should be included in the list of examples;

2. Paired trains should not be required for Method 26A;

3. CRWI supports modifying audit procedures if the CEMs is in-control for eight consecutive quarters; and

4. Additional clarifications or typographical errors.

Detailed comments on each of these areas are attached.

Thank you for the opportunity to comment on this proposed rule. 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
C. Sorrell, EPA

Specific comments

1. Method 26 should be included in the list of examples.

   The list of example reference methods in sections 2.3 (79 Fed. Reg. at 27,698) and 11.9.1 (79 Fed. Reg. at 27,702) includes Method 26A, Method 320, Method 321, and ASTM D6348-12. One of our members uses an HCl CEMs for compliance. Based on a TCEQ approved QA/AC plan, they have been successful for a number of years in showing that the instrument passes RATAs using Method 26. We are concerned that without Method 26 being explicitly added to this list, they and other facilities will be precluded from using Method 26 when doing future RATAs. Given that this facility has successfully used Method 26 for this purpose for many years, we see no reason why it should not be included.

   We understand that there are differences between Method 26 and Method 26A but do not believe that these differences should preclude Method 26 when appropriately used. The three differences are: a) Method 26A is sampled isokinetically while Method 26 is not; b) Method 26 uses smaller impingers; and c) Method 26 samples a smaller volume than does Method 26A. We will address each in turn.

   a) Isokinetic sampling is important if you are trying to obtain a representative sample when entrained particles (water droplets) are in the gas stream. If you are only sampling the amount of HCl in the gas stream, a representative sample can be obtained by non-isokinetic methods. In a stack that has entrained water droplets, isokinetic sampling is important because some of the HCl could be dissolved in those water droplets. If you look at the section 1.2 (applicability) of Method 26, you find the following statements.

      > This method is applicable for determining emissions of hydrogen halides (HX) [HCl, HBr, and HF] and halogens (X2) [Cl2 and Br2] from stationary sources when specified by the applicable subpart. Sources, such as those controlled by wet scrubbers, that emit acid particulate matter must be sampled using Method 26A.

      Section 1.2 of Method 26A has a similar set of statements

      > This method is applicable for determining emissions of hydrogen halides (HX) [HCl, HBr, and HF] and halogens (X2) [Cl2 and Br2] from stationary sources when specified by the applicable subpart. This method collects the emission sample isokinetically and is therefore particularly suited for sampling at sources, such as those controlled by wet scrubbers, emitting acid particulate matter (e.g., hydrogen halides dissolved in water droplets).

      Thus, the applicability sections of both Methods make it clear when each can be used. It should also be pointed out that Methods 320 and 321 are also non-isokinetic methods.

b) The size of the impingers and the volume of sample collected are related to the detection limit of the method, not to the accuracy of the method.

Finally, we note that in section 5.2.1.2 of Procedure 6 (79 Fed. Reg. at 27,713), EPA specifically mentions using Method 26 and Method 26A for analyzing audit samples. If Method 26 is appropriate to analyze audit samples, we see no reason why it cannot be used to analyze the stack gas samples as long as the applicability criteria in section 1.2 of the method are met.

If a facility has a dry stack (no entrained water droplets) and may not need the lower detection limits, they should be allowed to use a less complicated Method 26 as a part of their RATA. This is the case for our member that uses Method 26 for their RATA. Based on their experience and the constraints already built into Methods 26 and 26A, we see no reason why Method 26 should not be added to the list of methods in sections 2.3 and 11.9.1.

2. Paired trains should not be required for Method 26A.

We remain concerned about the requirement to use paired trains when using Method 26A (section 11.9.4.4, 79 Fed. Reg. at 27,702). We submitted comments on this during the informal comment period, expressing our concern and suggesting modification to the number of runs that could be discarded. The agency took some of our suggestions on discarding runs and we appreciate these modifications. However, our original concern about using dual trains remains.

In section 11.9.4.5, the Agency states that the primary reason for the dual trains is to "ensure the quality of the RM data." Since the Agency did not require dual trains for any other reference method, one must conclude that they believe there must be a problem with this method.

Performance Specification (PS) 12A is the only PS CRWI knows about that requires the use of paired reference method sampling trains (see Section 8.4.2 of PS 12A) when using Method 29. Paired trains are recommended in PS 11 (see section 8.6(1)(i)), but they are not required. The reason for paired runs was to demonstrate that the results of the paired runs were consistent by having to meet a relative difference requirement. Both Methods 26 and 26A have been widely used for a number of years to develop data both to set standard and to show compliance. We are not aware of any data that would indicate that the proper use of either method would result in inaccurate data. It should be noted that Method 26A has a known negative bias below 20 ppmv (section 13.1). However, this bias would show up in both trains (if a dual train was used) and would not have any impact on determining accuracy.

We understand that variability is higher as measurement get closer to the detection limit. This is true for any analytical method, not just Method 26A. We also

understand the need to get as accurate data as is reasonable. However, the data collected here is to show that the instrument meets specifications. If there is a large enough error in the reference method, that data point will either have to be discarded (if allowed) or the instrument will not pass the RATA. Thus, the responsibility to collect accurate data is on the facility, not the Agency. If a facility wants to use single trains and risk failing the RATA because the reference method data is suspect, this is their choice, not the Agency's. It seems that the Agency is requiring dual trains based on a single sentence in the section 11.9.4.4 with no data to back up that assertion.

Dual trains are more expensive and complicate the testing process. Before requiring them, we suggest that the Agency show they are warranted (i.e., the data from a single train is unreliable). One alternative is to follow the requirements in PS 11 and recommend the use of paired trains but not require them.

3. CRWI supports modifying audit procedures if the CEMs is in-control for eight consecutive quarters.

   The Agency is proposing (79 Fed. Reg. at 27,696) that if the CEMs is in-control for eight consecutive quarters that include a minimum of two RATAs and if the source releases less than 75% of the standard, the facility can modify their auditing procedures to use either cylinder gas audits (CGA) or dynamic spiking audits (DSA) each quarter for eight consecutive quarters but must conduct a RATA every two years. If the source fails a RATA, CGA, or DSA, the schedule returns to the normal requirements. The regulatory language is in Procedure 6, section 5.5 (79 Fed. Reg. at 27,714). CRWI supports this concept. We believe that this will add flexibility to requirements without creating risks that the instrument will be out of control.

   While the language in section 5.2.1 points to section 5.2.5 as an exception for doing a RATA once a year, it does not point to section 5.5. We suggest adding that. We also suggest that the exception in 5.5 be added to section 5.2.5. See the suggested additions (added text is <u>underlined</u>) below.

   > 5.2.1 Relative Accuracy Test Audit. The RATA must be conducted at least once every four calendar quarters, except as otherwise noted in section 5.2.5 <u>or section 5.5</u> of this procedure. Unless otherwise specified in an applicable regulation or permit, conduct the RATA during process operating conditions representing average production and full control operation at the source as specified in section 11.9.4 of PS–18 in Appendix B of this part.
   >
   > 5.2.5 Other Alternative Quarterly Audits. Other alternative audit procedures, as approved by the Administrator, may be used for three of four calendar quarters. One RATA is required at least every four calendar quarters, except <u>where the affected facility meets the criteria in section 5.5 or</u> in the case where the affected facility is off-line (does not operate in the fourth calendar quarter since the quarter of the previous RATA). In that case, the RATA shall be performed in the

quarter in which the unit recommences operation. Also, a CGA, DSA, RAA, or RATA is not required for calendar quarters in which the affected facility does not operate.

In addition, we are concerned that the ≤ 75% criteria in section 5.5.1 of Procedure 6 (79 Fed. Reg. at 27,714) can be interpreted in multiple ways. To further clarify this provision, we suggest that this be revised to be similar to the criteria in Part 63 Subpart A (40 CFR 63.8(f)(6)(iii)) and Part 60 Subpart A (40 CFR 60.13(j)(2)) to include the applicable averaging period as follows (changes underlined):

> 5.5.1 If the CEMS is in-control and if the source releases ≤ 75 percent of the HCl emission limit <u>for the averaging period specified in the relevant standard</u> for eight consecutive quarters that include a minimum of two RATA, the source owner or operator may revise their auditing procedures to use CGA, RAA or DSA each quarter for eight subsequent quarters following a RATA.

With this propose change, if the averaging period for the HCl emission limit is 12-hour rolling average but you exceed the 75% criteria on an hourly rolling average or one-minute average basis, you remain eligible for the optional testing frequency. Although the criteria already specifies the "emission limit" and emission limits (usually) have a specified "averaging period," the added language should make this provision clear and aligns Procedure 6 with the Subpart A requirements.

4. Additional clarifications or typographical errors.

In addition, CRWI makes the following suggestion to either clarify or correct what we believe are typographical errors.

a) The response time testing as described in section 11.6.7 (79 Fed. Reg. at 27,701) requires you to "Repeat the entire procedure three times…" To repeat something means that you have already completed the action once. We believe that this can be interpreted to mean that the response time test needs to be conducted a total of four times, the first time then repeated 3 more times. We realize that there is similar wording in PS-4A (which is referenced in PS-4B) but suggest that to make it clear the wording should be changed to "Repeat the entire procedure until you have three sets of data to determine the mean upscale and downscale RTs."

b) The equation in section 11.7.1.6 (79 Fed. Reg. at 27,701) for the average of the three CEMS responses appears incomplete. We assume that this is a simple typographical error and the equation should be the average MCi equal to the summation of the individual MCi values divided by 3.

c) All gas concentrations in Table 1 (79 Fed. Reg. at 27,705) have ranges except for CH2O (20 ppm) and NH3 (10 ppm). CRWI realizes that the column is titled

"Approximate Concentration," but to be consistent, we suggest that these constituents should also have a stated range that is acceptable.