While CRWI understands the desire for TCEQ to make the test report review process more efficient, we also see the need for the various parties preparing the reports to work equally efficient. Most emissions tests reports are completed using the individual sampling company created proprietary spreadsheets based on the applicable standardized or promulgated methods. These proprietary spreadsheets have been internally validated for accuracy by their user companies. To comply with TCEQ's proposed standardized reporting requires these companies to transcribe the same data into the TCEQ spreadsheet. This is not only a duplication of the same work, but also potentially introduces transcription issues, thus necessitating another significant QA/QC review to ensure no errors were made in transferring data.

The current TCEQ spreadsheet appears to be a rough draft that requires substantial refining before universal use is required. CRWI would like to suggest an alternative approach to making the TCEQ spreadsheet more usable by both the regulated community and TCEQ. We propose that TCEQ take the comments below (and from others) and develop a revised, "open source" second draft of the spreadsheet. TCEQ should then provide the revised spreadsheet to a limited number of emissions testing companies allowing them to use that version during actual tests. TCEQ should then evaluate the feedback from the beta testing to develop the next (third) version for general review by the regulated community. After a couple of iterations with different emissions testing companies and the regulated community, the spreadsheet may be ready for general use. However, CRWI wishes to note that regulated facilities, their emissions testing firms, and consulting firms that assist these facilities often have different formats that have been developed and utilized since the first HWC NESHAP CPT Reports were submitted. All are equally appropriate, yet potentially different. Thus, while CRWI conceptually supports a harmonization of data reporting, the approach to this should be robust. TCEQ should also realize that this process will take time to achieve.

Specific questions/comments/concerns:

1. The current beta version of the spreadsheet provided is not "open source." It is impossible for reviewers to verify any of the links and calculations performed therein for accuracy of the equations, unit conversions, etc. Users need to see those links and calculations to make sure they are correct. If the calculations are incorrect in the spreadsheet, who is liable for that mistake? Is it the company or TCEQ? How does this fit into potential enforcement actions?

2. The connection and alignment of spreadsheets is unclear. Sampling events are described simply as "Runs" instead of test condition, run number, and train type (e.g., Method 5, Method 26A, Method 29, Method 0010, Method 0023A, etc.). Multiple trains are often operated concurrently during a single test run. The data entry alignment is confusing for data input and likely later for the TCEQ data reviewer. One should be able to enter information once and that information be carried to subsequent spreadsheets on a train type basis. Multiple transcription entries increase the potential for data entry errors.

3. The D/F section only requires analytical values to be entered. How and where does the spreadsheet calculate TEQ values? How are non-detect (ND) values handled in calculating TEQ for compliance? Is there never a need for total D/F values that would include both the 2,3,7,8-congeners and total D/Fs by homolog group? Are zeroes to be directly entered for ND values? What if all seventeen (17) of the 2,3,7,8-congeners are ND such that the TEQ value is zero as can and does happen with units that do not burn chlorinated materials? If the sampling train is not operated to sample the minimum target volume or time such that NDs cannot be counted as zeroes in the TEQ calculation, how does the spreadsheet deal with this situation?

4. There are no provisions for flagged data (such as a compound being detected between the detection limit and reporting limit, or when a compound is found in both the blank and the sample, when there is a data quality issue, etc.). How will flagged data be entered into and identified in the spreadsheet? Additionally, there are no provisions for adding notes.

5. If analyzing additional metals beyond those listed, how do these get entered into the spreadsheet?

6. How is data rounding handled? At times, the number of significant digits will make a difference. Final emission and performance results are normally rounded and reported to only two (2) significant figures. How does the spreadsheet make this final adjustment in the reporting?

7. For metals, the spreadsheet has a single analytical value data entry for each metal. If the sampling train is configured to sample for non-mercury metals only and analyzed per the method, there are two (2) analysis fractions per train/run. If the sampling train is configured to also sample for mercury and analyzed per the method, there are five (5) analysis fractions per train/run for mercury. The spreadsheet as configured does not allow for analysis input of the individual sampling fractions. Nor, does the spreadsheet include for optional blank correction per Method 29. This section requires substantial additional work to align with the sampling and analysis methodology.

8. For SVOC POHC, the spreadsheet similarly has a single analytical value data entry for one (1) POHC. If the sampling train is analyzed per the method, there are three (3) analysis fractions per train/run:

    - Front-half composite (probe rinse, filter, and front-half of filter holder solvent rinses)
    - Back-half composite (XAD-2 resin trap, and back-half of filter holder and condenser solvent rinses)
    - Condensate (impinger contents and solvent rinses).

Additionally, there are no provisions for multiple SVOC POHCs. This section requires substantial additional work to align with the sampling and analysis methodology.

9. For volatile POHCs (VOST), the spreadsheet assumes use of a single volatile POHC. What provision is there for multiple volatile POHCs?

10. There are no provisions in the spreadsheet for reporting the “back half” of a Method 5 train.

11. Emissions testing companies will be required to substantially revise existing or create a new data reduction spreadsheet to align with the TCEQ spreadsheet.

12. Is this a duplication of what is already required in ERT?

13. How does the user deal with “data in lieu” for D/Fs and DRE?

14. The spreadsheet is set up with twelve (12) isokinetic run pages. We assume this is for the multiple trains that might be performed in one three-run CPT condition. For the typical test program, one may have for Condition I Method 5/26A, Method 29, and Method 0010/0023A Runs 1, 2, 3. Most likely there is a Condition II for Method 0010/0023A with Runs 1, 2, 3. If a volatile POHC is used, then there are VOST data to be included. Which stack flow value is to be entered for the VOST calculations?

    So as not to be confusing to the data entry person or the TCEQ reviewer, how are these typical kinds of test program situations going to correspond to Run 1, Run 2, etc., to the run number and sequences in the test program and reporting in the sampling company spreadsheets versus the TCEQ spreadsheet? A Rosetta Stone of sorts will be required to communicate the correlation between how the test plan and report identify the various test conditions/ runs and the calculations in the TCEQ spreadsheet.