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The Coalition for Responsible Waste Incineration (CRWI) appreciates the opportunity to submit comments on *Revisions to Test Methods, Performance Specifications, and Testing Regulations for Air Emission Sources: Proposed Rule*. 80 FR 54,146 (September 8, 2015). CRWI is a trade association comprised of 25 industry members that use the test methods being modified.

Attached are specific comments on a number of the proposed changes.

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](mailto:mel@crwi.org)).

Sincerely yours,

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### Specific Comments

1. Comments on proposed changes to Method 1.

Section III.G. (80 FR 54,148) of the preamble states that “In Method 1, section 11.2.1.2, the word ‘instances’ will be changed to ‘distances’ in the second sentence.” However, the October 17, 2000, *Federal Register* notice (65 FR 61,780) does not contain this error and Section 11.2.1.2 of Method 1 has not been modified since that date. This error is contained in the eCFR version of Method 1 as published by the Government Publishing Office. As such, this error does not exist in the officially promulgated version of Method 1 and is an example of the types of errors present in the eCFR version of the rules. This is a cautionary example that the eCFR “is not an official legal edition of the CFR” as stated in the User Notice for the eCFR and should not be relied upon as the final version of a rule. Therefore, the cited correction is not necessary and the only correction needed is to the eCFR version. It is our understanding that a correction to eCFR can be made at any time and does not require a *Federal Register* notice.

The current version of section 11.2.1.2 has four sentences. As proposed (80 FR 54,157), the revised language for that paragraph only has two sentences and corrects the typo from the eCFR version (see the paragraph above). If finalized as written, it would also eliminate the last two sentences from the current version. We believe that the elimination of the last two sentences was unintended. Should the Agency agree with our comment in the previous paragraph, there is no need to do anything except correct the eCFR language. Should the Agency believe that a *Federal Register* notice is necessary to correct eCFR, the final rule should contain all four sentences and should read as follows.

11.2.1.2 When the eight- and two-diameter criterion cannot be met, the minimum number of traverse points is determined from Figure 1-1. Before referring to the figure, however, determine the distances from the measurement site to the nearest upstream and downstream disturbances, and divide each distance by the stack diameter or equivalent diameter, to determine the distance in terms of the number of duct diameters. Then, determine from Figure 1-1 the minimum number of traverse points that corresponds: (1) to the number of duct diameters upstream; and (2) to the number of diameters downstream. Select the higher of the two minimum numbers of traverse points, or a greater value, so that for circular stacks the number is a multiple of 4, and for rectangular stacks, the number is one of those shown in Table 1-1.

2. Comments on proposed changes to Method 4.

A. We identified six typographical errors in the changes to Section 12.2.5 of Method 4 (80 FR 54,159).

- 1) In the equation for moisture content in section 12.2.5 (middle of the third column), the subscript letters for  $B_{ws}$  are a different case from those in the definition (lower part of the first column). We believe that the lower case should be used for both.
  - 2) In the equation for  $B_A$ , the term  $P_{Br}$  should be  $P_{Bar}$ . Also, the term for ambient temperature should be a capital “T” instead of the lower case.
  - 3) In the definition for  $B_H$ , the operator should be “=” instead of “≤.”
  - 4) In the equation for  $B_H$ , the subscript for the wet F-factor should be a lower case “w” instead of capitalized.
  - 5) The definition for  $F_d$  needs to be changed to “ $10^6$  Btu” instead of “106 Btu.”
  - 6) In the definition for relative humidity (%RH), the word “hydrometer” should be changed to “hygrometer.”
- B. We identified four typographical errors in the changes to Section 16.4 of Method 4 (80 FR 54,159).
- 1) In the equation for moisture content (lower part of the third column), the subscript letters in  $B_{ws}$  should be lower case instead of capitalized.
  - 2) In the equation for  $B_A$ , the term  $P_{bar}$  should be  $P_{Bar}$ .
  - 3) In the definition for  $F_d$ , the reference to Equation 19-3 of Method 19 should be changed to Equation 19-13.
  - 4) In the definition for wet F-factor ( $F_w$ ), the subscript should be a lower case “w” instead of capitalized. In addition, the reference to Equation 19-4 of Method 19 should be changed to Equation 19-14.

3. Comments on proposed changes to Method 5.

In the first sentence of Section 6.1.1.9 (80 FR 54,160) within the parenthesis, delete the second “at.” This error was promulgated in the February 27, 2014, revisions to this section.

4. Comments on proposed changes to Method 7E.

We identified three typographical errors in Equation 7E-8 (80 FR 54,161). The term  $NO_x$  Corr should be  $NO_{xCorr}$ . The term  $NO_x$  should be  $NO_x$ . The term  $EffNO_2$  should be  $Eff_{NO_2}$ .

5. Comments on proposed changes to Method 25C.

In the changes to Section 12.5.2 (80 FR 54,163), the reference to Equation 25C-4 should be changed to Equation 25C-5.

6. Comments on proposed changes to Method 26.

We suggest that the English equivalent to 0.12 dscm – 4.24 dscf – be added to section 13.3 after the Metric quantity so it would read “and 0.12 dscm (4.24 dscf) of stack gas sampled...”

7. Comments on proposed changes to Method 26A

The preamble (80 FR 54,149) states that language on dissociated chlorine salts will be added to section 4.3. In the proposed regulatory language, it appears that the original sentence in this section is being replaced by the new sentence. We believe this to be an inadvertent error and suggest the Agency include both sentences in the final rule. The new language would be as follows.

4.3 High concentrations of nitrogen oxides ( $\text{NO}_x$ ) may produce sufficient nitrate ( $\text{NO}_3^-$ ) to interfere with measurements of very low  $\text{Br}^-$  levels. Dissociating chloride salts (e.g., ammonium chloride) at elevated temperatures interfere with halogen acid measurement in this method. Maintaining particulate probe/filter temperatures at  $120 \pm 14$  °C ( $248 \pm 25$  °F) minimizes this interference.

8. Comments on proposed changes to Method 30B.

The preamble (80 FR 54,149) states that section 8.3.3.8 of Method 30B is being modified to update the ASTM Method number. The proposed regulatory language (80 FR 54,165) does not include the last two sentences from the current version of this section. We believe this was inadvertently and suggest that the final version include them. The final version should read as follows.

8.3.3.8 Sample Handling, Preservation, Storage, and Transport. While the performance criteria of this approach provides for verification of appropriate sample handling, it is still important that the user consider, determine, and plan for suitable sample preservation, storage, transport, and holding times for these measurements. Therefore, procedures in ASTM D6911–15 “Standard Guide for Packaging and Shipping Environmental Samples for Laboratory Analysis” (incorporated by reference—see 40 CFR 60.17) shall be followed for all samples, where appropriate. To avoid Hg contamination of the samples, special attention should be paid to cleanliness during transport, field handling, sampling, recovery, and laboratory analysis, as well as during preparation of the sorbent cartridges. Collection and analysis of blank samples (e.g., reagent,

sorbent, field, etc.) is useful in verifying the absence or source of contaminant Hg.

9. Comments on proposed changes to Performance Specification 2.

It is not clear to us how section 6.1.1 is being revised. Currently, this section has paragraphs 6.1.1, 6.1.1.1, 6.1.1.2, 6.1.1.3, and 6.1.1.4. The way the proposed regulatory language is written, paragraphs 6.1.1.1 through 6.1.1.4 would be deleted and paragraph 6.1.1 has been re-written. This seems to match up with the proposed changes to the definition of the span value in section 3.11. If this was what was intended, we support that change. However, if the Agency intends to keep paragraphs 6.1.1.1 through 6.1.1.4, the intent needs to be made clearer.

In addition, the preamble (80 FR 54,149) states that “In section 16.3.2, the characters “&verbar;dverbar” will be replaced with  $\bar{d}$ , which is the average difference between responses and the concentration/responses.” Section 16.3.2 of Performance Specification 2 was promulgated on the October 17, 2000 (65 FR 62,134), and did not include the characters “&verbar;dverbar.” This section has not been modified since the 2000 notice. The characters “&verbar;dverbar” are also not present in the eCFR version of Performance Specification 2. Therefore, the Agency is attempting to change rule language that does not exist. It should be noted that the original Section 16.3.2 contained the term  $|\bar{d}|$  and not the term  $\bar{d}$  as stated in Section III.DD. of the preamble.

10. Comments on proposed changes to Performance Specification 3.

In section 13.2 following Equation 13-1 (80 FR 54,166), a definition is provided for the symbol  $\bar{d}$ . While the definition clearly states that the term is an absolute value, it does not match what is in the equation. To be consistent, we suggest that the term should include the absolute value symbol  $|\bar{d}|$ .

11. Comments on proposed changes to Performance Specification 4A.

In section 8.3.1 (80 FR 54,166), the proposed language requires the procedure to be repeated three times. We believe that the Agency intends for the process to be done three times. However, the way it is worded, it would be required to be done four times – the first time and then repeated three times. We suggest that this section be re-worded to make it clear that a total of three times is required. To do this, we suggested that the second to last sentence be modified as follows to clarify that only three sets of data are required to be collected.

“Repeat the entire procedure until you have three sets of data to ~~times and~~ determine the mean upscale and downscale response times.”

12. Comments on proposed changes to Performance Specification 11.

In the definition for Equation 11-1 (80 FR 54,167), the “and” is in the wrong place. It should be at the end of the definition for  $R_U$ .

The current version of section 12.1 contains subsections (1) through (3). The proposed changes to section 12.1 (80 FR 54,177) only include subsections (1) and (2). Subsection (3) requires the summarization of the results. We assume that this subsection was inadvertently left out and suggest that it be included in the final rule.

13. Comments on proposed changes to Procedure 2.

In section (3) of 12.0 (80 FR 54,168), the definitions for Equation 2-2 have an “and” in the wrong place. It should be moved to the end of the definition for  $R_U$ . In the definitions for Equation 2-3, an “and” should be inserted at the end of the definition for  $R_L$ .

Accuracy is usually determined based on comparison to the Reference Method result as indicated in the denominator of the equation (see Equation 2-1a of Procedure 2). The revision to Equation 2-4 of (80 FR 54,168) makes this comparison to the gas volume measured by the CEMS being tested and not to the Reference Method. Also, accuracy calculations usually include the absolute value of the differences to avoid a negative result. We believe that Equation 2-4 should be modified as follows.

$$\text{Accuracy} = \frac{|V_M - V_R|}{V_R} \times 100 \quad (\text{Eq. 2-4})$$