



June 27, 2022

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Heritage Thermal Services
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TEConsulting, LLC
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INDIVIDUAL MEMBERS

Ronald E. Bastian, PE
Ronald O. Kagel, PhD

ACADEMIC MEMBERS

(Includes faculty from:)

Clarkson University
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Lamar University
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University of Dayton
University of Kentucky
University of Maryland
University of Utah

43330 Junction Plaza, Suite 164-641
Ashburn, VA 20147

Phone: 703-431-7343
E-mail: mel@crwi.org
Web Page: <http://www.crwi.org>

U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attn: Docket ID No. EPA-HQ-OAR-2020-0556

The Coalition for Responsible Waste Incineration (CRWI) appreciates the opportunity to submit comments on the *Testing Provisions for Air Emission Sources*; Proposed rule. 87 FR 24,488 (April 26, 2022). 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 combustion industry.

CRWI has comments on two specific proposed changes. At 87 FR 24,492, the Agency proposes to update the entire Performance Specification 4B to be compatible with all other performance specifications. CRWI supports this idea but has a suggestion we believe will make the specification easier to use. One of the more frustrating parts of this performance specification as it is currently written is the frequent references to other performance specifications. A user is constantly moving back and forth between performance specifications to actually determine the requirements. CRWI suggests that when this performance specification is rewritten, all of the requirements be included in the method, where practical. We understand that in certain circumstances, reference to another performance specification is appropriate. However, it is used too much in the current version of Performance Specification 4B. Please minimize the use of references in the updated version.

At 87 FR 24,492, EPA is proposing to remove paragraph 5.3 of the Appendix to Subpart EEE of 40 CFR Part 63. CRWI supports this action. As currently written, this section requires that an interference response test must be conducted every time a Relative Accuracy Test Audit (RATA) or an Absolute Calibration Audit (ACA) is conducted. These tests are required every quarter (RATA annually and ACA every other quarter – see paragraphs 5.1 and 5.2). Paragraph 5.3 references Performance Specifications 4B (CO and O₂) and 8A (total hydrocarbons). When Performance

Specifications 4B and 8A are examined, there are no references to an interference response test. This made it difficult to determine how to comply with this requirement. CRWI sent an email to Mike Galbraith (staff for the then EPA Office of Solid Waste) on June 30, 2003, asking for clarification on how to comply. Shortly after (dates for this email are not clear), METCO Environmental sent a similar message to Mr. Galbraith. In this case, METCO was scheduled to conduct a RATA for a client but the client, METCO, the Texas Commission on Environmental Quality, and Region 6 were not able to locate the procedures needed to conduct an Interference Response Test. EPA staff consulted with their contractors and on July 23, 2003, responded in an email stating “Please note that we agree with our contractor's conclusions, namely that we do not believe there is a strong need to require interference testing. If there is a requirement in the appendix, it is there by error and we need to remove it.” A copy of the entire email thread is attached.

This problem has been known since 2003. It shows up periodically and members produce the email thread to show that this test does not exist and is not actually required. Officially removing the sentence in the opening paragraph of Section 5, removing paragraph 5.3, and renumbering paragraph 5.4 as proposed would correct this problem. CRWI supports this change.

Thank you for the opportunity to comment. 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: L. Melton
Attached: EPA letter interference test 7.3.2003