During the June 5, 2013 meeting between Veolia and EPA Region 5 representatives in Chicago, EPA agreed to provide to Veolia a checklist of items that Veolia failed to include in its August 5, 2012 CPT Plan. This checklist was generated directly from EPA's May 13, 2013 letter commenting on Veolia's August 5, 2012 CPT Plans for Incinerators 2, 3, and 4 (May 13, 2012 Comment Letter). This checklist should not be read or cited to out of context of EPA's May 13, 2013 Comment Letter. This checklist does not include the two items Veolia requested further discussion on, specifically items 1 and 9 in the May 13, 2013 letter. EPA will be available to discuss these two topics with Veolia at a mutually convenient time.

CPT Comments:

1. Pretesting period to reach steady-state. Section 4.10 of the CPT Plan (item 2 of the May 13, 2013 letter); → will change test plan to make it so OPLS removed only for pretesting. check to see if letter of approval is needed.
2. Waste profiles for each waste Veolia plans to burn during the CPT. Section 3.0 of the CPT Plan (item 3 of the May 13, 2013 letter);
3. External combustion chamber length for Incinerators 2 & 3 and units of measurements for external length, external diameter, and internal diameter in Table 2-1 of the CPT Plan. Correct the date of manufacture of the incinerators in Table 2-1. (item 4 of the May 13, 2013 letter);
4. Further details on how weekly AWFCO testing will interfere with operations and increase emissions. Section 2.8.1 of the CPT Plan (item 5 of the May 13, 2013 letter);
5. Sorbent feedrate for Incinerators 2 & 3 in Section 2.5.1.1 and Section 2.5.1.2 for Incinerator 4. (item 6 in the May 13, 2013 letter);
6. Quench flow rate in Section 2.5.1.2 for Incinerator 2 & 3 and Section 2.5.1.3 for Incinerator 4. (item 6 in the May 13, 2013 letter);
7. How Veolia plans to control emissions during equipment malfunction. Sections 2.3.6 and 2.4 (item 7 in the May 13, 2013 letter)
8. Revise time to meet steady state operations to reflect the residence time for solids. Section 4.9 (item 8 of the May 13, 2013 letter);
9. Include the carbon feedrate in Table 1-2. (item 9 of the May 13, 2013 letter)
10. More robust explanation of how extrapolated feedrate limits will adequately ensure compliance with emission standards. Section 4.6 of the CPT Plan (item 10(a) of the May 13, 2013 letter);
11. Documentation of the historical range of normal metals feedrates for each feedstream. Section 4.6 (item 10(b) in the May 13, 2013 letter);
12. Documentation that the level of spiking recommended during the test will mask sampling and analysis imprecision and inaccuracy to the extent that the extrapolated feedrate limits adequately assure compliance with the emissions standards. Section 4.6 (item 10(c) in the May 13, 2013 letter);

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David 13. Documentation of the activated carbon injection rate that is required to maintain the calculated mercury system removal efficiency at the extrapolated mercury feedrate. Section 4.6 (item 10(d) in the May 13, 2013 letter);

14. Include the 12-hour rolling average data for mercury, LVM, and SVM for the past 5 years. Amend the proposed feedrates during the CPT to capture the extreme range of normal conditions. (item 11 in the May 13, 2013 letter);

15. Documentation that the expected feedrate for Chlorine during the test is at its normal or higher 12-hour rolling average feedrates. (item 12 in the May 13, 2013 letter);

16. Include the highest 12-hour rolling average ash feedrate during the previous 5 years and the planned ash feedrate. (item 13 in the May 13, 2013 letter);

17. Descriptions of spike preparation procedures including manufacturer certificates of purity, scale calibration documentation, and detailed lab methodology demonstrating good laboratory practices for preparing the spikes. Section 4.5 (item 14(B) of the May 13, 2013 letter);

18. Change "verified" to "confirmed". (item 14(B) of the May 13, 2013);

19. Provide SOP for producing mercury spike solution and vials. Section 4.5.4 (item 14(C) of the May 13, 2013 letter);

20. Add that Veolia will be prepared to provide dupplicate samples; Section 5.1 (item 14(D) of the May 13, 2013 letter);

21. State who will be collecting and compositing waste samples. Section 5.1.1 (item 14(E) of the May 13, 2013 letter);

22. State that spike samples will be analyzed and not archived. Section 5.1.1 (item 14(E) of the May 13, 2013 letter);

23. Fix the narrative in Section 5.1.1 to reflect that there will be three chromium spike samples collected per run. (item 14(E) of the May 13, 2013 letter);

24. Explanation why three grab samples are adequate for characterizing solid-matrix waste streams. Table 5-2 (item 14(F) in the May 13, 2013 letter);

25. State that the results are to be provided on an *as received* or *wet-weight* basis. Section 5.2 (item 14(G) of the May 13, letter);

26. Change the reference in Section 5.4 to the <u>*EPA Requirements for Quality Assurance Project Plans (QA/R-5)*</u>. (item 14(H) of the May 13, 2013 letter);

27. Indicate all the laboratories and sub-laboratories Veolia plans to use. Section 5.4.2 (item 14.(I) of the May 13, 2013 letter);

28. Correct the mercury OPLs in Table 2-3 of the CPT plan. (page 8 of the May 13, 2013 letter). discuss

QAPP Comments (taken directly from the May 13, 2013 letter):

1. In Section 1.0, Veolia must include the missing required elements of a QAPP, such as distribution list, problem definition, and data quality objectives;
2. In Section 2.0, Veolia must indicate who will perform data validation;

3. In Section 3.0, on page 3 of 3, Veolia must state all the quality objectives for all sampling and analysis; going to add all
4. In Section 4.4, Veolia must submit with the CPT plans the profile of each waste it plans to burn during the CPT;
5. In Section 4.5, Veolia must state the SOP and quality assurance objectives for the waste feed spiking. The spike samples should be labeled as confirmed, not verified;
6. In Section 4.7, Veolia must correct the conditioning times to account for solids-residence time;
7. In Section 6.0, Veolia must include a discussion of compositing and sample splitting procedures. For example, will samples be composited in a safe manner, such as in a laboratory hood?
8. In Section 6.4, Veolia must provide names for all sub-contract laboratories and identify their respective analyses;
9. In Section 8.0, Veolia must provide all laboratory specific SOPs with the QAPP;
10. In Section 8.5, Veolia must state which moisture analysis method will be used by what lab. Veolia should specify that results will be presented on an *as received* or *wet weight* basis and that samples to be analyzed for volatile components, such as mercury, will not be dried before extraction;
11. In Section 9.1.2, Veolia must include a discussion or reference to compositing and sample splitting procedures;
12. In Section 9.2.6, Veolia must provide the procedure for spike preparation;
13. In Section 10.1.2, Veolia must account for the weight of charge boxes as fed. The boxes contribute to the weight of material fed to the incinerator, but are not expected to include the same amount of MACT metals as in the waste. The concentrations of MACT metals within the waste should be applied to the weight of the waste only in the mass balance, not the combined weight of the charge box and waste;
14. In Section 10.2, Veolia must include who will independently validate the data and how it will be validated. Using the laboratory validation is not acceptable;
15. In Section 11.0, Veolia must include who will perform the quality control analysis.

talk to Todd briefly on it. Todd's analysis on box contribution. Mon.