To: Argentieri, Sabrina[argentieri.sabrina@epa.gov]
Cc: Lambesis, Christopher[Lambesis.Christopher@epa.gov]; Ramaly, Todd[ramaly.todd@epa.gov]
From: Downey, Shannon
Sent: Wed 7/17/2013 3:40:54 PM
Subject: FW: CPT Plan

Final version of the email sent to Veolia.

From: Downey, Shannon
Sent: Wednesday, July 17, 2013 10:40 AM
To: 'Dennis J Warchol'
Cc: David A Klarich; Marshall, Sarah
Subject: RE: CPT Plan

Dennis and Dave,

Based on our discussion on July 15, 2013, it is EPA's understanding that after Veolia incorporates the changes we discussed during the call, there are still two issues left to resolve in order for EPA to approve Veolia's CPT and QAPP. We propose to resolve the remaining two issues as specified below. If Veolia submits an approvable CPT and QAPP, that addresses all of our comments, by Friday, July 19, 2013, EPA is willing to grant a two week extension to Veolia's test date, which would put the CPT date at September 19, 2013.

Thank you for the information about the target Hg concentrations. We look forward to the rest of the information discussed on Monday about the spike preparation.

Item 1: Historical data of the waste Veolia plans to burn during the test

Based on the first paragraph of your below email, EPA is concerned that Veolia is using wastes that it has limited or no data about and has never before received to represent normal operating conditions during this test. Please provide EPA with information that demonstrates why Veolia believes these new waste streams are in fact representative of Veolia's current operating conditions.

For each waste stream that has never been received before by Veolia, please provide the profile, along with any profile sampling that has been done by Veolia and/or the generator, and any other generator information about the waste stream.

For any waste streams for which Veolia has limited data, please still provide the limited data (including acceptance sampling) in addition to any profile sampling that has been done by Veolia and/or the generator, and any other generator information about the waste stream.

During the July 15, 2013 call, EPA suggested Veolia sample the waste streams being fed during the test every 15 minutes. We recommend that Veolia include this rate in the CPT for the solid and liquid waste streams.

Item 2: Test Conditions. Conditions 1 and 2 refer to the conditions described in EPA's email sent on July 11, 2013.

EPA has had numerous discussions with Veolia about what we consider to be representative operating conditions during the CPT. During the June 12, 2013 meeting, EPA explained the importance of conducting a test that was both representative and at the extreme range of normal, as required under 40 C.F.R § 63.1207(g). To that end, EPA cannot approve a plan where the metals OPL is set during minimum temperature testing conditions on Units 2, 3, and 4.

Furthermore, on Unit 4 only, EPA needs Veolia to demonstrate that D/F and metals are simultaneously controlled well enough at the current carbon feedrate when D/F and metals are each maximized. Metals emissions cannot be maximized at a minimum temperature. Veolia has stated it has concerns about how the OPLs will be set in this scenario. EPA wants to clarify that Veolia must demonstrate whether mercury emissions pass or fail the MACT standards during EPA's Condition 2 as well as EPA's Condition 1. Similarly, Veolia must demonstrate whether D/F emissions pass or fail the MACT standards during EPA's Condition 1, as well as EPA's Condition 2. If the metals pass during EPA's Condition 2, Veolia will not need to average these numbers with the three runs when it conducts EPA's Condition 1. The same will be true for the D/F run during EPA's Condition 1 run.

Please do not hesitate to contact me if you have further questions.

Shannon Downey
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From: Dennis J Warchol [mailto:dennis.warchol@veoliaes.com]
Sent: Tuesday, July 16, 2013 4:08 PM
To: Downey, Shannon
Cc: David A Klarich
Subject: CPT Plan

Shannon,

After reviewing the potential list of liquid and solid waste stream candidates for the CPT, we are finding that some of these streams have never been received before and others have limited data due to a lack of being received. In order to satisfy the Agency's concerns of waste stream heterogeneity, Veolia is concerned that with the data available we will not be able to do this.

As a solution to this comment, Veolia is proposing to modify the CPT to require sampling of all liquid and solid waste streams every 30 minutes. This was proposed as a solution from USEPA if there was a lack of data for solids. Veolia, in order to satisfy the Agency's concern, is proposing that all waste feeds be sampled every 30 minutes regardless of previous available data.

Let us know if that is acceptable and we will incorporate that into the Plans.

Also, during our call yesterday, it was requested that we provide anticipated Hg spike concentrations and target Hg feed. Veolia is anticipating that the Hg spike concentration for Unit 4 will be approximately 2% and Units 2 and 3's will be approximately 1000 ppm. Hg feed rates will be approximately 0.04 lbs/hr for Unit 4 and Units 2 and 3's will be approximately 0.002 lbs/hr. The target concentrations and feed rates will be better defined when the spike material is prepared and the feed streams are determined.

Please call Dave or me if you have any questions.

SERVICE FIRST SAFETY ALWAYS

Dennis J. Warchol

EHS Manager

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