Comprehensive Performance Test (CPT) Plan Common Deficiencies

DRAFT-SUBJECT TO REVISIONS

Omitted Documents:

Note: The following documents are required to be included with the CPT Plan submittals. They can be found on our I&HW Webpage under Hazardous Waste Combustion Program section. Please submit a Correspondence Cover Sheet (Form TCEQ-20714) with all Industrial and Hazardous Waste applications and reports.

- A redline/strikeout copy showing revisions made to the previous plan.
- CPT Plan Review Checklist
- CPT Plan Coversheet

Failure to provide the following:

- Procedures for rapidly stopping the hazardous waste feed and controlling emissions in the event of an equipment malfunction. [40 CFR §63.1207(f)(1)(viii)]
- Latest Target Feed Rates and Operating Conditions. Provide the target feed rates, and operating conditions from the latest Hazardous Waste Combustors Maximum Achievable Control Technology (HWC MACT) Notice of Compliance (NOC) and RCRA Permit Limits. Must clearly identify any changes proposed.
- Clearly identify and communicate the test plan and approach including clearly defined test conditions and operating parameter limits (OPLs) for each test condition.
- Proposed Automated Waste Feed Cut Off (AWFCO) limits within the measurement range of respective process monitors.
- Compliance with an emission standard specified on a hazardous waste thermal concentration basis (i.e., pounds emitted per million Btu of heat input). For details on Emission standards based on hazardous waste thermal concentration, refer to 40 CFR §63.1207(m)(2)(i) and§63.1207(m)(2)(ii).
- Documentation of the historical range of normal (i.e., other than during compliance testing) metals feedrates for each feed stream.
- Document in the CPT Plan that the surrogate adequately correlates with gas flowrate. [40 CFR §63.1209 (m)(7) and §63.1209(j)(2), (k)(3), (m)(2)(i), (n)(5)(i), and (o)(2)(i)]
- The hazardous waste residence time [40 CFR §63.1206(b)(11].
- The margin of safety of the proposed spiking rate with regard to the anticipated stack gas flow rate, detection limit, and desired destruction and removal efficiency.

- Detailed Quality Assurance Project Plan (QAPP) and objectives including QA personnel and signatory information.
- Continuous Monitoring System Performance Evaluation Test (CMSPET) requirements [40 CFR §63.8]. Elements such as Absolute Calibration Audits (ACA), Annual Relative Accuracy Test Audits (RATA), etc. as required in 40 CFR §63.8 and Appendix to Subpart EEE of 40 CFR Part 63. (Quality Assurance Procedures for Continuous Emissions Monitors Used for Hazardous Waste Combustors).