UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

June 8, 2015

Owen W. Monconduit
Brigadier General (Ret)
Louisiana Military Department
Deputy Director, Contracting & Purchasing
6400 St. Claude Avenue
Jackson Barracks
New Orleans, LA 70117

Dear Brigadier General (Ret) Monconduit,

This letter corrects and replaces the June 5, 2015, letter and documents the Environmental Protection Agency's (EPA) final determination for these Applicable, Relevant, and Appropriate Requirements (ARAR) for the Camp Minden Superfund Removal Site (site).

During the regular operations, the Louisiana Military Department will: (a) continuously measure carbon monoxide (CO), Total Hydrocarbon (THC), nitrogen oxides (NOx) and oxygen in the stack using CEMS, (b) continuously measure stack gas flow rate in the stack; (c) continuously measure combustion air supplied to the after burner; and (d) measure all other operating parameters established during the performance test.

A. During the regular operations, the LMD will meet the following emissions standards:

- Carbon monoxide 20 ppmdv or less at the stack gas conditions;
- Total hydrocarbon 3 ppmdv or less at the stack gas conditions, if oxygen is more than 17% in the stack;
- Total hydrocarbon 10 ppmdv or less, corrected to 7% oxygen, if oxygen is 17% or less in the stack;
- NOx limit of 250 ppmdv at the stack gas condition; and demonstrate that this limit will meet hourly and annual National Ambient Air Quality Standards for NOx.

B. Sampling will be conducted to demonstrate compliance: (a) quarterly for 99.99% DRE, and (b) semi-annual for dioxins/furans standards. The following requirements were previously transmitted to you via email:

- Initial Acceptance Testing of the Contained Burning System – LMD will continuously monitor at the stack for CO, Total Hydrocarbons, NOx, O2, and stack gas flow rate. LMD will also sample for volatiles, semi-volatiles (which include dinitrotoluene, dibutylpthalate, and diphenylamine), particulate and dioxins/furans.
- Continuous Monitoring of the Contained Burning System after the completion of the Acceptance Testing – LMD will continuously monitor at the stack for CO, Total Hydrocarbons, NOx, O2 and stack gas flow rate.
- Periodic Sampling of the Contained Burning System after the completion of the Acceptance Testing – LMD will sample from the stack every three months for volatiles and semi-volatiles (which include dinitrotoluene, dibutylpthalate, and diphenylamine). LMD will use the sampling results to calculate and demonstrate compliance with the Destruction and Removal Efficiency.

C. In addition, during the performance test, LMD will establish operating conditions limits for minimum temperatures in the combustion zones, maximum waste feed rate, stack gas flow rate, combustion air flow rate to afterburner, and all other parameters in the combustion system (including the pollution abatement system) that would affect both the stack emissions, and Destruction and Removal Efficiency (DRE). For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values (except for THC, CO and NOx measurements noted in paragraph A above) will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.

D. The AOC requires EPA to provide an independent review and approval of all Work, or any waiver from a standard that is required. Paragraph 96 in the AOC requires EPA to issue a Notice of Completion of Work after EPA determines the Work has been fully performed in accordance with the AOC. As such, the approval language in the attached list of ARARs has been corrected (Items 20, 26, 36, and any other similar language).

E. In item 78, the word "incinerated" has been replaced by "destroyed."

Please see the attached ARARs document you submitted to the Agency on June 4, 2015, with revisions in Red.

We look forward to continuing our work with the State of Louisiana to complete the on-site destruction of materials at Camp Minden. If you have any questions, please contact Greg Fife at (214) 665-6773.

Sincerely,

Carl E. Edlund, P.E.
Director
Superfund Division

Enclosure

cc: LDEQ

Attachment E
Environmental and Compliance Considerations

All work to be performed will be subject to all applicable EPA, OSHA, LDEQ, DPS, Military Department, state and federal laws, regulations, policies, permits, licensing requirements, and guidance. This document is not an inclusive list. Work may be governed by additional regulations, guidance, policies or laws. Applicable requirements may be dependent upon the unit design and operations.

1. This removal action will be conducted to eliminate the actual or potential release of hazardous substances, pollutants, or contaminants to the environment, pursuant to CERCLA, 42 U.S.C. §9601 et seq., and in a manner consistent with the National Contingency Plan (NCP), 40 CFR Part 300, as required at 33 U.S.C. §1321(c)(2) and 42 U.S.C. §9605. Pursuant to 40 CFR Part 300.415(j), fund-financed removal actions under CERCLA §104 and removal actions pursuant to CERCLA §106 shall, to the extent practicable considering the exigencies of the situation, attain the applicable or relevant and appropriate requirements under Federal and State environmental laws. Site-specific ARARs and to-be-considered (TBCs) for this site include: 40 C.F.R. Part 264, Subpart X operations, maintenance, monitoring, performance, closure and post-closure requirements; 40 C.F.R. Part 264 Subpart EE storage, and 40 C.F.R. § 265.382; explosives storage handling, and disposal procedures listed in Military Explosives, Department of the Army Technical Manual, Handbook on the Management of Munitions Response Actions; EPA OSWER, Interim Final; Ammunition Handbook: Tactics, Techniques, and Procedures for Munitions Handlers; Department of the Army, Prediction of Safe Life of Propellants, Picatinny Arsenal; Reports of Explosives Safety Assistance Visits (March and April 2013), Department of the Army Explosives Safety Board; and the Louisiana Administrative Code, Title 55, Part I, Chapter 15 – Explosives Code.

2. Should the response action generate hazardous waste residues requiring off-site disposal, the RCRA waste analysis requirements found at 40 C.F.R. §§ 261.20 and 261.30; the RCRA manifesting requirements found at 40 C.F.R. §§ 262.20; and the RCRA packaging and labeling requirements found at 40 C.F.R. §§ 262.30, shall be appropriate for this action. All off-site transportation of hazardous waste will be performed in conformity with RCRA and U.S. Department of Transportation requirements. See generally 40 C.F.R. Part 263. All hazardous substances removed for off-site disposal shall be disposed at a facility in compliance with environmental laws and regulations, as determined by LDEQ and EPA, under 40 C.F.R. §§ 300.440 and LAC 33:V.Subpart 1(Hazardous Waste Regulations) and LAC 33:VII (Solid Waste Regulations).

3. All sampling and analytical methods to be used must be specified and any contract laboratory used to analyze the residues must be LELAP-certified per LAC 33:I.Subpart 3.

4. Shipping manifest for off-site shipments of any waste will be prepared and signed by Respondent or their authorized agent.

5. Work shall be in compliance with site specific ARARs (Table 3 of this document). These ARAR's were developed utilizing applicable requirements for a miscellaneous unit, but in order to provide proper operating parameters, some components of the 40 CFR Part 63, Subpart EEE Maximum Achievable Control Technology Standards (MACT) and State regulations under LAC 33:III were incorporated. The federal and state regulations have requirements associated with components such as pollutant control devices. As such the ARARS listed in Table 3 have been assigned generic descriptive names to clarify with components have specific applicable regulations.

6. Air Quality requirements:

Compliance with the Louisiana Ambient Air Quality standards (LAAQS) will be demonstrated. In the event air parameters do not have a LAAQ standard, the screening criteria reverts to National Ambient Air Quality standards (NAAQS). For reference, the ambient air quality standards for the burning of the M6/CBI are listed below in Table 1 and Table 2.

a. Table 1. Toxics

Pollutant	**CAS Number**	**AAS (mg/M^3)**	**Avg. Period**	**MER* (lbs/yr)**
2,4 dinitrotoluene	121-14-2	4.76	8-hour	100
2,6-dinitrotoluene	606-20-2	4.76	8-hour	100
Dibutyl phthalate	84-74-2	119.00	8-hour	380
Diphenylamine**	122-39-4	100	1-hour	not specified

*The Minimum Emission Rate (MER) is based on very conservative modeling done in the early stages of the Air Toxics program. Basically we use it as a check to determine if we need to consider this for modeling. If their TOTAL lbs/yr are lower than the MER than it is assumed that they will have little to no impact on the ambient air.

** EPA and LDEQ do not have an AAS for diphenylamine. The Texas Commission on Environmental Quality AAS for one hour effects screening level was used.

b. Table 2. Criteria Pollutants

Pollutant	**Avg. Period**	**NAAQS limit ($\mu g/M^3$)**
$PM_{2.5}$	24-Hour Period	35
$PM_{2.5}$	Annual	12
PM_{10}	24-Hour Period	150
PM_{10}	Annual	50
NO_x	1-hour	188
NO_x	Annual	100
SO_2	1-hour	195
SO_2	3-hour	1300
SO_2	24-hour	365
SO_2	Annual	80
CO	1-hour	40,000
CO	8-hour	10,000

7. Post Removal Site Control: Site Cleanup requirements:

As required by LAC 33:V.3507 (Closure Performance Standard). Upon completion of the treatment of all materials, the Respondent must identify and clean up any releases (of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products), to the soils from equipment, handled products, and stored/treated wastes. As a means of satisfying the closure requirements the Respondent may demonstrate an alternative risk-assessment-based closure in accordance with LAC 33:I.Chapter 13 (LA RECAP) Site to be restored to pre-removal action conditions, as per Post Removal Site Control Plan to include, but not limited to:

a. The Respondent will specify the Closure Performance Standard in the Post Removal Site Control Plan. This includes determining the baseline concentration of each expected constituent in soil for later comparison to applicable closure performance standard or alternate risk-assessment-based closure standard (RECAP standards).

b. The Respondent will develop a sampling plan to be followed after treatment activities to determine whether a release has occurred. Necessarily this will involve setting action levels above which will be considered a release and what remedial actions, if any, will be taken in response to a demonstrated release. The Respondent may demonstrate an alternative risk-assessment-based closure standard in accordance with LA RECAP. If the Respondent utilizes the alternative standards in RECAP, he must provide a framework for how the RECAP evaluation will proceed (will it be Screening Option only, or will it progress to Management Option

1, 2, etc). RECAP utilizes look-up tables with values that may or may not be altered by site-specific data. If a constituent is not listed in the tables, propose a surrogate compound with a justification for the substitution.

Table 3. List of State of Louisiana RCRA/CERCLA/AIR/WATER ARARs for the Removal Action at Camp Minden Systems.

Item #	Activity	Required/ Applicable	Regulatory Citation	Description
1.	**Work to be performed**	Required	LAC 33:IX.2501.A.1 LAC 33:IX.2511.A.1.b **OR** 40 CFR Part 300 or 33 CFR 153.10.e	Apply for develop and implement a **Storm Water Pollution Prevention Plan (SWPPP)** for the site. **OR** Conduct all discharges of process wastewater, process area storm water, and/or uncontaminated storm water from the site according to **instructions from the Federal On-Scene Coordinator (FOSC). (**The FOSC specifies the monitoring requirements for discharges of process wastewater, process area storm water, and/or uncontaminated storm water from the site and requires the development and implementation of a **SWPPP**. NOTE: All discharges should be monitored for the hazardous substances and chemicals at the site and the products and by-products of combustion of those hazardous substances and chemicals burned at the site.)
2.	**Work to be performed**	Required	LAC 33:III Chapter 7 Ambient Air Quality	As per LAC 33:III.705.A, the standards of ambient air quality listed in LAC 33:III.711.A, Table 1 and 711.B, Table 1a define the limits of air contamination by particulates and gases, above which limits the ambient air is hereby declared to be unacceptable and requires air pollution control measures. Until additional pertinent information becomes available through surveillance and research with respect to the effects of the air contaminants listed in LAC 33:III.711.A, Table 1 and 711.B, Table 1a, the air quality limits listed in LAC 33:III.711.A, Tables 1 and 711.B, Table 1a shall apply in Louisiana. The limits stated include normal background levels of particulates and gases.
3.	**Work to be performed**	Required	LAC 33:V.Chapter 22 40 CFR Part 264	Permanent **on-site disposal** of any hazardous materials is prohibited by state and federal regulations
4.	**Health and Safety Plan**	Required	LAC 33:V.717 40 CFR Part 264	Procedures for **public notification** to the surrounding community and state and local governments must be provided in the health and safety plan, and adhered to during removal, combustion, and while conducting post removal actions. At a minimum meet the requirements of LAC 33:V.717.
5.	**Quality Assurance, Sampling and Data Analysis**	Required	LAC 33:I. Chapter 45 (LA Laboratory Accreditation program); LAC 33:I.Chapter 13	Any **lab samples** must be analyzed by an LA accredited laboratory; all data analysis must meet the QA/QC requirements of EPA SW-846 Methods, and appropriate detection limits for evaluating the closure performance standard.

Item #	Activity	Required/ Applicable	Regulatory Citation	Description
6.	**Post-Removal Site Control**	Required	LAC 33:I.Chapter 13 (Use of appropriate sample placement and analytical methods.)	The Respondent must conduct confirmatory sampling in order to determine post removal clean up effectiveness. All sample analyses must utilize appropriate EPA – SW-846 methods. All sample placement decisions must be equivalent to the relevant SW-846 Method Chapter 9, and/or RECAP Appendix B.
7.	**Post-Removal Site Control**	Required	LAC 33:I.Chapter 13 (Use of RECAP required for all CERCLA and RCRA activities in LA)	Samples must be collected for COCs intrinsic to combustion material for post removal site control confirmatory sampling.
8.	**Post removal Site Control**	Required	LAC 33:V.1103	**All residues from** the combustion activities, decon activities, must undergo hazardous waste determination classification to ascertain if the residues will have to be managed as RCRA hazardous waste.
9.	**Final Report**	Required	LAC 33:I.Chapter 13 (Use of RECAP required for all CERCLA and RCRA activities in LA)	**Final Reports** making determinations of adequacy of post removal must describe the closure performance standard(s), sample results (pre- and post-closure) and final disposition of any and all equipment. All analytical data should meet RECAP detection levels for reporting requirements.
10.	**Off-site shipments**	Required	LAC 33:V.1103; 1105, 1107; and Chapter 13 Transporter Requirements; 40 CFR Part 264	**All off site shipments of any materials** must be characterized for RCRA hazardous waste designation; and those materials that are designated as RCRA hazardous waste must be accompanied by **a RCRA manifest** at all times during transport while off-site.
11.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1206(b)(11)]	Calculate the waste residence time and include the calculation in the performance test plan under §63.1207(f) and the operating record. The Respondent must also provide the waste residence time in the Documentation of Compliance under §63.1211(c) and the Notification of Compliance under §§63.1207(j) and 63.1210(d). Demonstrate compliance with the appropriate design residence time of the Secondary Chamber limits from these ARARs.
12.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1206(b)(2)]	Conduct a comprehensive performance test under the requirements of §§63.1207(f)(1) and (g)(1) to document compliance with the affected emission standard(s). Conduct performance testing under representative operating conditions as defined in §63.6(f)(2)(iii)(B) and 63.7(e)(1), by operating in the extreme range of normal conditions.) If Respondent determines (based on Continuous Emission Monitoring (CEM) recordings, results of analyses of stack samples, or results of Compliance Monitoring System (CMS) performance evaluations) that any emission standard has been exceeded during a comprehensive performance test for a mode of operation, the Respondent must cease thermal treatment operations immediately under that mode of operation. The Respondent must make this determination within 90 days following completion of the performance test. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen

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				percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
13.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1206(c)(4)(i)]	If an emergency safety vent (ESV) [A rupture disc qualifies as an ESV] opens when waste remains in the combustion chamber (i.e., when the waste residence time has not expired) during an event other than a malfunction as defined in the startup, shutdown, and malfunction plan such that combustion gases are not treated as during the most recent comprehensive performance test (e.g., if the combustion gas by-passes any emission control device that was operating during the performance test), the Respondent must document in the operating record whether it remained in compliance with the emission standards of this subpart considering emissions during the ESV opening event.
14.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1206(c)(4)(ii)]	The Respondent must develop an ESV operating plan, comply with the operating plan, and keep the plan in the operating record. The ESV operating plan must provide detailed procedures for rapidly stopping the waste feed, shutting down the Thermal Treatment System, and maintaining temperature in the combustion chamber during the waste residence time, if feasible. The plan must include calculations and information and data documenting the effectiveness of the plan's procedures for ensuring that combustion chamber temperature is maintained as is reasonably feasible.
15.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1206(c)(4)(iii)]	After any ESV opening that results in a failure to meet the emission standards, the Respondent must investigate the cause of the ESV opening, take appropriate corrective measures to minimize such future ESV openings, and record the findings and corrective measures in the operating record.
16.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1206(c)(4)(iv)]	The Respondent must submit to the Administrator a written report within 5 days of an ESV opening that results in failure to meet the emission standards of this subpart to document the result of the investigation and corrective measures taken.
17.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1206(c)(7)]	Prepare and at all times operate according to an operation and maintenance plan that describes in detail procedures for operation, inspection, maintenance, and corrective measures for all components of the Thermal Treatment System, including associated pollution control equipment, that could affect emissions of regulated hazardous air pollutants.
18.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1208(b)(1)(i)]	Dioxins and furans (D/F): Determine the amount of emissions using the EPA Test Method 0023A, Sampling Method for Polychlorinated Dibenzo-p-Dioxins and Polychlorinated Dibenzofurans emissions from Stationary Sources. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%,

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				the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
19.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1209(b)(2)(i)]	Calibrate thermocouples at a frequency and in a manner consistent with manufacturer specifications, but no less frequent than once per year. The Respondent must operate and maintain optical pyrometers in accordance with manufacturer specifications unless otherwise approved by the Administrator. The Respondent must calibrate optical pyrometers in accordance with the frequency and procedures recommended by the manufacturer, but no less frequent than once per year.
20.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1209(j)(3)]	Waste Feed rate <=_TBD lb/hr to the Thermal Treatment System. Specify operating parameters and limits to ensure that good operation of each waste firing system is maintained. The initial design feed rate shall be confirmed during the initial compliance test. Any change to the design feedrate based upon the compliance test shall be approved by EPA.
21.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1209(j)(3)]	Waste Feed rate monitored by technically sound method at the regulation's specified frequency. Statistical Basis: Hourly maximum
22.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1219(b)(1)(i)]	Dioxins and furans (D/F) <= 0.11 ng/dscm for Thermal Treatment System equipped with a dry air pollution control system. A source equipped with a wet air pollution control system followed by a dry air pollution control system is not considered to be a dry air pollution control system, and a source equipped with a dry air pollution control system followed by a wet air pollution control system is considered to be a dry air pollution control system for purposes of this standard. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
23.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1219(b)(1)(ii)]	Dioxins and furans (D/F) <= 0.20 ng/dscm for Thermal Treatment System not equipped with a dry air pollution control system. A source equipped with a wet air pollution control system followed by a dry air pollution control system is not considered to be a dry air pollution control system, and a source equipped with a dry air pollution control system followed by a wet air pollution control system is considered to be a dry air pollution control system for purposes of this standard. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen

Item #	Activity	Required/ Applicable	Regulatory Citation	Description
				percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
24.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1219(b)(7)]	Particulate matter (10 microns or less) (PM10) <= 0.0016 gr/dscf. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
25.	TD-1 – Thermal Treatment System	Required	[40 CFR 63.1219(c)(1)]	POHC (principal organic hazardous constituent) >= 99.99 % DRE. The Respondent must calculate DRE for each POHC from the following equation: DRE = [1 - (Wout / Win)] × 100% Where: Win = mass feedrate of one POHC in a waste feedstream; and Wout = mass emission rate of the same POHC present in exhaust emissions prior to release to the atmosphere.
26.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.D]	Ensure that all Thermal Treatment System are approved by EPA prior to installation. Make suitable application to LDEQ and EPA if planning to install or operate a Thermal Treatment System.
27.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.E] [40 CFR 63.1208(b)(6)]	Determine the amount of SVOC's emitted using the EPA Test Method 0010. (Note: This method is applicable to the determination of Destruction and Removal Efficiency (DRE) of semivolatile Principal Organic Hazardous Compounds (POHCs) from combustion systems.) Laboratory analysis shall determine emissions of 2,4 dinitrotoluene, 2,6-dinitrotoluene, diphenylamine and dibutyl phthalate. [LAC 33:III.2521.E, 40 CFR 63.1208(b)(6)]
28.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.E] [40 CFR 63.1208(b)(6)]	The Respondent shall propose an appropriate method to determine the amount of particulate matter (10 microns or less) emitted using the test methods from 40 CFR 60, Appendix A
29.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.10]	Submit notification: Due to the Office of Environmental Services at least 30 days prior to performing any emissions test, to afford DEQ the opportunity to conduct a pretest conference and to have an observer present.
30.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.11] [40 CFR 63.1206(b)(12)(ii)] [40 CFR 63.1219(d)]	Submit monitoring and test results: Due to the Office of Environmental Services within 60 days of completion of testing. Document compliance with the emission standards based on the arithmetic average of the emission results of each run, except that the Respondent must document compliance with the destruction and removal efficiency standard for each run of the comprehensive performance test individually.

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31.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.1]	Particulate matter (10 microns or less) (PM10) <= 0.04 gr/dscf. Note that 40 CFR 63.1219(b)(7) is more stringent. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
32.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.2]	Ensure that all Thermal Treatment System are multi-chambered or equivalent as determined by LDEQ. Equip all multi-chambered Thermal Treatment System with secondary burners.
33.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.2]	For Thermal Treatment System the Secondary Chamber: Temperature >= 1500 ºF for at least 1 second.
34.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.3]	Equip with an interlock that prevents the charge door from opening for 10 minutes after the secondary burner is ignited, or until the secondary chamber exit gases reach 1500 degrees Fahrenheit, whichever occurs first. Install a visual warning system to alert the operator when the interlock system is by-passed for service or cleaning.
35.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.4]	Do not burn or cause or permit the burning of refuse in any installation which was designed for the sole purpose of burning fuel without the authorization of LDEQ.
36.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.5]	Ensure that all Thermal Treatment System are designed with a stack emission point which does not adversely impact the local area air quality. Ensure that all Thermal Treatment System stack heights are approved by EPA. (Approval will be based upon modeling results.)
37.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.6]	Secondary Chamber: Carbon monoxide (CO) monitored by CEM continuously. Measure the carbon monoxide concentration in the exit flue gas.
38.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.6]	Secondary Chamber: Carbon monoxide (CO) recordkeeping by CEM continuously. Record the carbon monoxide concentration in the exit flue gas.
39.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.6]	Secondary Chamber: Oxygen monitored by CEM continuously. Measure the oxygen concentration in the exit flue gas.

Item #	Activity	Required/ Applicable	Regulatory Citation	Description
40.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.6]	Secondary Chamber: Oxygen recordkeeping by CEM continuously. Record the oxygen concentration in the exit flue gas.
41.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.6]	Secondary Chamber: Temperature monitored by temperature monitoring device continuously. Measure the exit flue gas temperature.
42.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.6]	Secondary Chamber: Temperature recordkeeping by recorder continuously. Record the exit flue gas temperature.
43.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.8.b] [40 CFR 63.1219(b)(5)(i)]	Carbon monoxide (CO) <= 100 ppmdv. [LAC 33:III.2521.F.8.b, 40 CFR 63.1219(b)(5)(i)]
44.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.8.c]	Nitrogen oxides (NOx) <= 250 ppmdv.
45.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.8.d]	Flue gas: Excess Oxygen >= 2 % by volume (dry basis).
46.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.8.e]	Opacity <= 10 percent.
47.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.F.9]	Conduct emission tests to verify compliance with the standards for the pollutants listed in LAC 33:III.2521.F.9.a , F.9.c and F.9.e using the test methods from 40 CFR 60, Appendix A or other appropriate EPA source.
48.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.G]	Do not cause or permit the handling, use, transport, or storage of any material in a manner which allows or may allow particulate matter, fly ash, etc., to become airborne in amounts that will cause a public nuisance or cause ambient air quality standards to be violated.
49.	TD-1 – Thermal Treatment System	Required	[LAC 33:III.2521.H]	Maintain all equipment, accessories, and appurtenances of a Thermal Treatment System installation in proper working condition and ensure that they are in operation at all times while the Thermal Treatment System is in use.
50.	DF - Exhaust Particulate filtration system	Required	[40 CFR 63.1206(c)(8)(i)(A)]	If the Thermal Treatment System is equipped with a baghouse (fabric filter), the Respondent must continuously operate a bag leak detection system. A fabric filter differential pressure indicator qualifies as a bag leak detection system. Note that the proposed HEPA filter does not qualify as a

Item #	Activity	Required/ Applicable	Regulatory Citation	Description
				baghouse for the purpose of these ARARs.
51.	DF - Exhaust Particulate filtration system	Required	[40 CFR 63.1206(c)(8)(ii)(C)]	The bag leak detection system shall be equipped with an alarm system that will sound an audible alarm when the differential pressure is outside the range established during the initial compliance test and any appropriate vendor recommendation.
52.	DF - Exhaust Particulate filtration system	Required	[40 CFR 63.1206(c)(8)(ii)(D)]	The bag leak detection system shall be installed and operated in a manner consistent with available written guidance from the EPA or, in the absence of such written guidance, the manufacturer's written specifications and recommendations for installation, operation, and adjustment of the system.
53.	DF - Exhaust Particulate filtration system	Required	[40 CFR 63.1206(c)(8)(ii)(E)]	The initial adjustment of the system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time. Following initial adjustment, the Respondent must not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time, except as detailed in the operation and maintenance plan. The Respondent must not increase the sensitivity by more than 100 percent or decrease the sensitivity by more than 50 percent over a 365 day period unless such adjustment follows a complete baghouse inspection which demonstrates the baghouse is in good operating condition.
54.	DF - Exhaust Particulate filtration system	Required	[40 CFR 63.1206(c)(8)(iii)(A)	The Respondent must initiate the procedures used to determine the cause of the alarm or bag leak detection system malfunction within 30 minutes of the time the alarm first sounds.
55.	DF - Exhaust Particulate filtration system	Required	[40 CFR 63.1206(c)(8)(iii)(B)	The Respondent must alleviate the cause of the alarm or bag leak detection system malfunction by taking the necessary corrective measure(s) which include, but are not to be limited to, the following: (1) Inspecting the baghouse for air leaks, torn or broken filter elements, or any other malfunction that may cause an increase in emissions; (2) Sealing off defective bags or filter media; (3) Replacing defective bags or filter media, or otherwise repairing the control device; (4) Sealing off a defective baghouse compartment; (5) Cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system; or (6) Shutting down the Thermal Treatment System.
56.	DF - Exhaust Particulate filtration system	Required	[40 CFR 63.1206(c)(8)(iii)]	The operating and maintenance plan must include a corrective measures plan that specifies the procedures the Respondent will follow in the case of a bag leak detection system alarm or malfunction. The corrective measures plan must include, at a minimum, the procedures used to determine and record the time and cause of the alarm or bag leak detection system malfunction in accordance with the requirements of paragraph (c)(8)(iii)(A) of this section as well as the

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				corrective measures taken to correct the control device or bag leak detection system malfunction or to minimize emissions in accordance with the requirements of paragraph (c)(8)(iii)(B) of this section. Failure to initiate the corrective measures required by this paragraph is failure to ensure compliance with the emission standards in this subpart.
57.	DF - Exhaust Particulate filtration system	Required	[40 CFR 63.1206(c)(8)(iv)]	If the Respondent operates the Thermal Treatment System when the detector response exceeds the alarm set-point or the bag leak detection system is malfunctioning more than 5 percent of the time during any 6-month block time period, the Respondent must submit a notification to the Administrator within 30 days of the end of the 6-month block time period that describes the causes of the exceedances and bag leak detection system malfunctions and the revisions to the design, operation, or maintenance of the Thermal Treatment System, baghouse, or bag leak detection system utilized to minimize exceedances and bag leak detection system malfunctions. Document compliance with this requirement in accordance with 40 CFR 63.1206(c)(8)(iv)(A) through (D).
58.	DF - Exhaust Particulate filtration system	Required, as applicable1	[40 CFR 63.1209(k)(1)(i)]	If the Thermal Treatment System is required to comply with a dioxin/furan or Semivolatile metals and low volatility metals emission limit, establish a limit on the maximum temperature of the flue gas at the inlet to the baghouse on an hourly rolling average. Base the limits on operations during the comprehensive performance test, unless the limits are based on manufacturer specifications. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
59.	DF - Exhaust Particulate filtration system	Required, if installed	[40 CFR 63.1209(b)(2)(i)]	If required to be installed, calibrate thermocouples at a frequency and in a manner consistent with manufacturer specifications, but no less frequent than once per year. The Respondent must operate and maintain optical pyrometers in accordance with manufacturer specifications unless otherwise approved by the Administrator. The Respondent must calibrate optical pyrometers in accordance with the frequency and procedures recommended by the manufacturer, but no less frequent than once per year.
60.	DF - Exhaust Particulate filtration system	Required, if installed	[40 CFR 63.1209(b)(2)(i)]	If required to be installed, the calibration of thermocouples must be verified at a frequency and in a manner consistent with manufacturer specifications, but no less frequent than once per year.
61.	DF - Exhaust Particulate filtration system	Required, if installed	[40 CFR 63.1209(k)(1)]	Flue gas Temperature <=_TBD F at the inlet to the Baghouse. Base the limits on operations during the comprehensive performance test, unless the limits are based on manufacturer specifications. Limit applies only if the unit is subject to a dioxin/furan or Semivolatile metals and low volatility metals emission limit. Statistical Basis: hourly rolling

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				average.
62.	DF - Exhaust Particulate filtration system	Required, if installed	[40 CFR 63.1209(k)(1)]	If Required, Baghouse Inlet flue gas Temperature monitored by temperature monitoring device continuously. Statistical Basis: hourly rolling average.
63.	DF - Exhaust Particulate filtration system	Required, if installed	[40 CFR 63.1209(k)(1)]	If Required, Baghouse Inlet flue gas Temperature recordkeeping by recorder continuously
64.	DF - Exhaust Particulate filtration system	Required, if installed	[40 CFR 63.1219(b)(7)]	Particulate matter (10 microns or less) (PM10) <= 0.0016 gr/dscf. If a particulate filtration system will be supplied, the vendor must guarantee compliance with this design parameter and verified during the performance testing program. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
65.	DF - Exhaust Particulate filtration system	Required	[LAC 33:III.501.C.6]	Baghouses (including gaskets): Equipment/operational data monitored by technically sound method semiannually or whenever a visible emissions check indicates maintenance may be necessary. Change elements as necessary.
66.	DF - Exhaust Particulate filtration system	Required	[LAC 33:III.501.C.6]	Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of inspections and maintenance activities on site for a period of at least five years and available for inspection by the Office of Environmental Compliance.
67.	DF - Exhaust Particulate filtration system	Required	[LAC 33:III.501.C.6]	Filter vents: Differential Pressure >_TBD and <_TBD inches w.c.. Filter vent is defined as the structure encasing the baghouse where the differential pressure monitoring system is installed
68.	DF - Exhaust Particulate filtration system - EQT 0003	Required	[LAC 33:III.501.C.6]	Filter vents: Differential Pressure monitored by pressure drop instrument during operation across the filter to determine whether a breach of the filter has occurred. If readings indicate a breach, return the filter to compliance as expeditiously as practicable, but at a maximum within three working days, in accordance with good air pollution control practices for minimizing emissions.
69.	DF - Exhaust Particulate filtration system	Required	[LAC 33:III.501.C.6]	Filter vents: Equipment/operational data recordkeeping by electronic or hard copy during operation. Keep the purchase order or manufacturer certification showing that the installed filters meet the Manufacturer's specification for particulate matter removal efficiency or the filter MERV

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				rating, as applicable; records of visible emissions checks or differential pressure gauge readings, as applicable; and records of maintenance activities. Keep records on site for a period of at least five years and available for review by the Office of Environmental Compliance.
70.	DF - Exhaust Particulate filtration system	Required	[LAC 33:III.501.C.6]	System stack: Visible emissions monitored by visual inspection/determination once daily during operation. If visible emissions are observed, return the filter(s) to proper operation as expeditiously as practicable, but at a maximum within three working days, in accordance with good air pollution control practices for minimizing emissions.
71.	RLP-1 - Designated release point for monitoring	Required	[40 CFR 63.1209(a)(2)]	Install, calibrate, maintain, and continuously operate all CEMS in compliance with the quality assurance procedures provided in the appendix to this subpart and Performance Specifications 4B (carbon monoxide and oxygen), in appendix B, part 60 of this chapter.
72.	RLP-1 - Designated release point for monitoring	Required	[40 CFR 63.1209(a)(6)(iii)]	Continue monitoring carbon monoxide and oxygen when the waste feed is cutoff if the source is operating. The Respondent must not resume feeding waste if the emission levels exceed the standard.
73.	RLP-1 - Designated release point for monitoring	Required	[40 CFR 63.1209(b)(2)]	Install, calibrate, maintain, and continuously operate the continuous air flow monitor (CMS) in compliance with the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system and the CMS requirements of 40 CFR 63.8(c)(3) and 40 CFR 63.1209(b)(3) through (b)(5).
74.	RLP-1 - Designated release point for monitoring	Required	[40 CFR 63.1209(j)(2)(ii)]	Flue gas: Flow rate <=11,000 ft^3/min (nominal). Statistical Basis: hourly rolling average of measurements while the system is operating. Value listed is the design and shall be confirmed or modified based upon the compliance test.
75.	RLP-1 - Designated release point for monitoring	Required	[40 CFR 63.1209(j)(2)]	Comply with the limit on the maximum flue gas flowrate that was determined in the site-specific unit design as an appropriate surrogate for gas residence time.
76.	RLP-1 - Designated release point for monitoring	Required	[LAC 33:III.501.C.6]	Conduct weekly emission tests of NOx using hand held portable monitors (approved as listed on LDEQ's web page) to verify compliance with LAC 33:III.2521.F.8.c for nitrogen oxides. If a NO_X CEMs is installed then this requirement is not required
77.	RLP-1 - Designated release point for monitoring	Required	[LAC 33:III.501.C.6]	PPM values of Nitrogen oxides (NOx) recordkeeping by electronic or hard copy weekly if using hand held monitor, else continuously if using a NO_X CEMs
78.	Mtls - Testing Requirements for Metal Emissions	Required, if seeking testing waivers	[40 CFR 63.1209(c)(1)]	Prior to feeding the M-6 Propellant and Clean Burning Incendiary (CBI), the Respondent must obtain an analysis of each feedstream that is sufficient to document compliance with the applicable feedrate limits provided by this section. If any material other than the M-6 and CBI is to be destroyed, perform an analysis of those materials also. (May include but not limited to supersack material, cardboard boxes, etc.) The analysis shall determine the chemical composition of the material for the pollutants of concern; which consist of Chlorine, Mercury, Cadmium, Lead, Arsenic,

Item #	Activity	Required/ Applicable	Regulatory Citation	Description
				Beryllium, Chromium, Cobalt, Manganese, and Nickel. Develop and implement a feedstream analysis plan and record it in the operating record. The plan must specify at a minimum the elements specified in 40 CFR 63.1209(c)(2)(i) through (vi).
79.	Mtls - Testing Requirements for Metal Emissions	Applicable, if waiver granted	[40 CFR 63.1209(c)(5)]	Waiver of monitoring of constituents in certain feedstreams. The Respondent is not required to monitor levels of metals or chlorine in the feedstreams to document compliance with the feedrate limits under this section provided that the Respondent documents in the comprehensive performance test plan the expected levels of the constituent in the feedstream and account for those assumed feedrate levels in documenting compliance with federate limits: natural gas, process air, and feedstreams from vapor recovery systems.
80.	Mtls - Testing Requirements for Metal Emissions	Applicable, if waiver granted	[LAC 33:III.501.C.6]	Waiver of performance test on a per pollutant basis. Do not conduct performance tests to document compliance with the mercury, semivolatile metals, low volatile metals, or hydrogen chloride/chlorine gas emission standards if the analysis of the feedstream determines (within the parameters of the approved test method) a non-detect of the pollutants of concern. On a per pollutant basis, if pollutants of concern are detected, then proceed to the Waiver of performance test option specified under 40 CFR 63.1206(b)(2).
81.	Mtls - Testing Requirements for Metal Emissions	Applicable, if waiver granted	[40 CFR 63.1207(m)]	Waiver of performance test. Do not conduct performance tests to document compliance with the mercury, semivolatile metals, low volatile metals, or hydrogen chloride/chlorine gas emission standards if meeting the conditions specified in paragraph (m)(1) or (m)(2) of this section. Comply with all requirements of: (m)(1) Emission standards based on exhaust gas flow rate (m)(2) Emission standards based on waste thermal concentration
82.	Mtls - Testing Requirements for Metal Emissions	Required, if waiver not granted	[40 CFR 63.1206(b)(2)]	When not granted a waiver of Performance Testing, conduct a comprehensive performance test under the requirements of §§63.1207(f)(1) and (g)(1) and §1208(b) to document compliance with the affected emission standard(s). Conduct performance testing under representative operating conditions as defined in §63.6(f)(2)(iii)(B) and 63.7(e)(1), by operating in the extreme range of normal conditions. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.

Item #	Activity	Required/ Applicable	Regulatory Citation	Description
83.	Mtls - Testing Requirements for Metal Emissions	Required, if waiver not granted	[40 CFR 63.1208(b)(2)]	If not granted a waiver, conduct emission tests to verify compliance with the standards for the Mercury using Method 29, provided in appendix A, part 60 of this chapter. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
84.	Mtls - Testing Requirements for Metal Emissions	Required, if waiver not granted	[40 CFR 63.1208(b)(3)]	If not granted a waiver, conduct emission tests to verify compliance with the standards for the Cadmium and Lead combined using Method 29, provided in appendix A, part 60 of this chapter. Conduct the performance tests when the particulate matter control device is in steady state operation and a separate set when the particulate matter control device undergoes its normal (or more frequent) cleaning cycle. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
85.	Mtls - Testing Requirements for Metal Emissions	Required, if waiver not granted	[40 CFR 63.1208(b)(4)]	If not granted a waiver, conduct emission tests to verify compliance with the standards for the Arsenic, Beryllium, and Chromium combined using Method 29, provided in appendix A, part 60 of this chapter. Conduct the performance tests when the particulate matter control device is in steady state operation and a separate set when the particulate matter control device undergoes its normal (or more frequent) cleaning cycle. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
86.	Mtls - Testing Requirements for Metal Emissions	Required, if waiver not granted	[40 CFR 63.1208(b)(5)]	If not granted a waiver, conduct emission tests to verify compliance with the standards for the Hydrogen chloride and chlorine gas combined using Method 26A as provided in appendix A, part 60 of this chapter; or Methods 320 or 321 as provided in appendix A, part 63 of this chapter, or ASTM D 6735-01, Standard Test Method for Measurement of Gaseous Chlorides and Fluorides from Mineral Calcining Exhaust Sources - Impinger Method to measure emissions of hydrogen chloride, and Method 26A to measure emissions of chlorine gas, provided that the Respondent follows the provisions in paragraphs (b)(5)(C)(1) through (6) of this section. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be

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				corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
87.	Mtls - Testing Requirements for Metal Emissions	Required, if waiver not granted	[40 CFR 63.1209(n)]	When a waiver is not granted for all Semivolatile metals and low volatility metals, the Respondent must comply with the semivolatile metal (cadmium and lead) and low volatile metal (arsenic, beryllium, and chromium) emission standards by establishing and complying with the applicable operating parameter limits as specified in 40 CFR 63.1209(n)(1) through 3). The Respondent must base the limits on operations during the comprehensive performance test, unless the limits are based on manufacturer specifications. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
88.	Mtls - Testing Requirements for Metal Emissions	Required, if waiver not granted	[40 CFR 63.1209(o)]	When a waiver is not granted for Hydrogen chloride and chlorine gas, the Respondent must comply with the hydrogen chloride and chlorine gas emission standard by establishing and complying with the appropriate operating parameter limits as specified in 40 CFR 63.1209(o)(1) through (4). The Respondent must base the limits on operations during the comprehensive performance test, unless the limits are based on manufacturer specifications. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
89.	Mtls - Testing Requirements for Metal Emissions	Required, if waiver not granted	[40 CFR 63.1219(b)(2)]	When a waiver is not granted; Mercury <= 8.1 µg/dscm. Statistical Basis: One-hour rolling average. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
90.	Mtls - Testing Requirements for Metal Emissions	Required, if waiver not granted	[40 CFR 63.1219(b)(3)]	When a waiver is not granted; Cadmium and Lead (Pb) <= 10 µg/dscm combined emissions. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be

Item #	Activity	Required/ Applicable	Regulatory Citation	Description
				corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
91.	Mtls - Testing Requirements for Metal Emissions	Required, if waiver not granted	[40 CFR 63.1219(b)(4)]	When a waiver is not granted; Arsenic, beryllium, and Chromium, Dry Weight <= 23 µg/dscm combined emissions. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
92.	Mtls - Testing Requirements for Metal Emissions	Required, if waiver not granted	[40 CFR 63.1219(b)(6)]	When a waiver is not granted; Chlorine Gas and Hydrochloric acid <= 21 ppmdv combined emissions, expressed as a chloride (Cl(-)) equivalent. For the purpose of demonstrating compliance with emissions standards during the performance test or regular operations, all emission values will be corrected to 7% oxygen in the stack if the stack gas oxygen is 17% or less (based on measured oxygen percent in stack). If the stack gas oxygen is more than 17%, the above emission values will be calculated at 17% oxygen level, corrected to 7% oxygen in the stack.
93.	M-6 - Disposal process for M-6 Propellant	Required	[40 CFR 63.1208(b)(5)]	Any change in design, operation, or maintenance practices that were documented in the comprehensive performance test plan, Notification of Compliance, or startup, shutdown, and malfunction (SSM) plan that will not adversely affect compliance with the emission standards or operating requirements, must be documented in the operating record upon making such change. The Respondent must revise as necessary the performance test plan, Documentation of Compliance, Notification of Compliance, and SSM plan to reflect these changes.
94.	M-6 - Disposal process for M-6 Propellant	Required	[40 CFR 63.1206(c)(6)]	Establish training programs for all categories of personnel whose activities may reasonably be expected to directly affect emissions of air pollutants from the source. Such persons include, but are not limited to, chief facility operators, control room operators, continuous monitoring system operators, persons that sample and analyze feedstreams, persons that manage and charge feedstreams to the Thermal Treatment System, persons that operate emission control devices, and ash and waste handlers. Each training program shall be of a technical level commensurate with the person's job duties specified in the training manual. Each commensurate training program shall require an examination to be administered by the instructor at the end of the training course. Passing of this test shall be deemed the “certification” for personnel.

Item #	Activity	Required/ Applicable	Regulatory Citation	Description
95.	M-6 - Disposal process for M-6 Propellant	Required	[40 CFR 63.1207(e)(1)(i)]	Submit notification: Due to the Office of Environmental Services at least 90 days prior to performing any emissions test, to afford LDEQ the opportunity to conduct a pretest conference and to have an observer present. Submit site-specific comprehensive performance test(CTP) protocol and CMS performance evaluation test plan. The site -specific (CTP) shall contain all appropriate items specified in 40 CFR 63.1207(f)(1) and the results of the feedstream composition analysis. In addition submit the feedstream analysis plan to the Administrator for review and approval as required by 40 CFR 63.1209(c)(3). The site-specific CTP shall include any relevant waivers of testing allowed per 40 CFR 63.1207(m).
96.	M-6 - Disposal process for M-6 Propellant	Required	[40 CFR 63.1207(e)(2)]	The site-specific test plan and CMS performance evaluation test plan shall be made available to the public for review no later than 60 calendar days before initiation of the test. The Respondent must issue a public notice to all persons as directed by EPA announcing the availability of the test plans and the location where the test plans are available for review. The test plans must be accessible to the public for 60 calendar days, beginning on the date that the public notice is published. The location must be unrestricted and provide access to the public during reasonable hours and provide a means for the public to obtain copies. The notification must include the information specified in 40 CFR 63.1207(e)(2)(i) through (v).
97.	M-6 - Disposal process for M-6 Propellant	Required	[40 CFR 63.1207(j)(1)]	Within 90 days of completion of a comprehensive performance test, the Respondent must postmark a Notification of Compliance documenting compliance with the emission standards and continuous monitoring system requirements, and identifying operating parameter limits under §63.1209, and send it to EPA and LDEQ. Upon postmark of the Notification of Compliance, the Respondent must comply with all operating requirements specified in the Notification of Compliance in lieu of the limits specified in the Documentation of Compliance required under §63.1211(c). If the Respondent fails to postmark a Notification of Compliance by the specified date, Respondent must cease thermal treatment operations immediately. Failure to comply with the operating requirements is failure to ensure compliance with any applicable emission standards of Subpart EEE.
98.	M-6 - Disposal process for M-6 Propellant	Required	[40 CFR 63.1211(a)]	Submit reports in accordance with the table in 40 CFR 63.1211(a).
99.	M-6 - Disposal process for M-6 Propellant	Required	[40 CFR 63.1211(b)]	Record and retain the information as specified in the table in 40 CFR 63.1211(b).
100	M-6 - Disposal process for M-6 Propellant	Required	[LAC 33:III.537]	Comply with the Louisiana General Conditions as set forth in LAC 33:III.537.

1 If the results of the Comprehensive Performance Test reveal applicable concentrations of dioxins or furans, then items 58 through 63 shall be deemed applicable.

2 If this operational analysis is not performed, no waiver for compliance testing and other associated requirements shall be granted.