

HWC MACT Compliance Checklist - Operating Record

Unit Name

Requirement	Yes	No	Comments
Documentation of Compliance (DOC) [40 CFR 63.1213]			
1) Does the DOC include the following emission limits:			
a) 0.40 ng TEQ/dscm for dioxins?			
b) 130 ug/dscm for Hg?			
c) 34 mg/dscm for PM?			
d) 240 ug/dscm for SVM?			
e) 97 ug/dscm for LVM?			
f) 77 ppmv for total chlorine?			
g) 100 ppmv for CO?			
h) 10 ppmv for THC?			
i) 99.99% DRE?			
2) Does the DOC include the residence time?			
3) Does the DOC include limits on the following operating parameters:			
a) Minimum combustion temperature?			
b) Maximum flue gas flowrate or production rate?			
c) Maximum hazardous waste feedrate?			
d) Maximum feedrate of total mercury?			
e) Maximum ash feedrate?			
f) Maximum feedrate of SVM (Cd and Pb)?			
g) Maximum feedrate of LVM (As, Be, Cr)?			
h) Maximum total chlorine and chloride feedrate?			
i) Pressure drop across scrubber?			
j) Solids content limit on wet scrubber?			
k) Minimum liquid feed pressure to scrubber?			
l) Minimum pH?			
m) Minimum L/G?			
n) Minimum power input?			
4) Does the DOC include a signed and dated certification that states that the CEMS and CMS are installed, calibrated, and continuously operated in compliance?			
5) Does the certification state that the facility is in compliance with the emission standards and that the OPLs ensure compliance with the emission standards based on an engineering evaluation?			
Operator Training and Certification [40 CFR 63.1206(c)(6)]			
1) Is there a training program for all categories of personnel whose activities may reasonably be expected to directly affect emissions of hazardous air pollutants from the source, including:			
a) Chief facility operators?			
b) Control room operators?			
c) CMS operators?			
d) Persons that sample and analyze feedstreams?			

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e) Persons that manage and charge feedstreams to the combustor?			
f) Persons that operate emission control devices?			
g) Ash and waste handlers?			
2) Is the training programs of a technical level commensurate with the person's job duties specified in the training manual?			
3) Is there an examination at the end of the training course?			
4) Is the source maintained and operated at all times by trained and certified personnel?			
5) Is a certified control room operator on duty at the site at all times when hazardous waste is being burned?			
6) Is there a separate training program for control room operators? Is it:			
a) Certification under ASME Standard Number QHO-1-1994 and QHO-1a-1996 Addenda?			
b) Certification under a State program?			
c) Site-specific, source-developed training and certification?			
7) If the control room operator training program is certification under the ASME standards, is full certification achieved by 9/30/04 (or a year after assuming duties for new employees)?			
8) If the control room operator training program is source-developed, does it include these elements:			
a) Training on environmental concerns (including types of emissions)?			
b) Training on basic combustion principles (including byproducts of combustion)?			
c) Training on operation of the specific type of combustor used by the source (including proper startup, waste firing, and shutdown procedures)?			
d) Training on combustion controls and CMS?			
e) Training on operation of APCE and factors affecting performance?			
f) Training on inspection and maintenance of the combustor, CMS, and APCE?			
g) Training on actions to correct malfunctions or conditions that may lead to malfunctions?			
h) Training on residue characteristics and handling?			
i) Training on applicable regulations, including OSHA?			
j) Examination designed and administered by instructor?			

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Requirement	Yes	No	Comments
k) Written material to serve as reference material after the course?			
l) Yearly refresher course?			
9) Does the yearly refresher course in number 8 above include the following:			
a) Update of regulations?			
b) Combustor operations?			
c) Inspection and Maintenance?			
d) Responses to malfunctions/conditions leading to malfunctions?			
e) Operating problems encountered by the operator?			
Feedstream Analysis Plan (FAP) [40 CFR 63.1209(c)(2)]			
1) Does the FAP include information on which parameters are analyzed in the feedstreams?			
2) Does the FAP include information on how the analysis is obtained, i.e. sampling, obtained from others, published documents?			
3) Does the FAP explain how the analysis is used to document compliance with feedrate limits (especially important for blended waste)?			
4) Does the FAP outline the test methods used?			
5) Does the FAP outline the sampling methods used?			
6) Does the FAP state the frequency of repetition of analysis?			
Startup, Shutdown, and Malfunction Plan (SSMP) [40 CFR 63.1206(c)]			
1) Does the SSMP incorporate the following general provision requirements of 40 CFR 63.6(e)(3):			
a) Detailed procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction?			
b) Corrective action program?			
c) A record of all startup, shutdown, and malfunction events demonstrating that the procedures in the SSMP are followed?			
d) A record of the duration of each startup, shutdown, and malfunction event?			
2) Does the SSMP include a description of potential causes of malfunctions (including ESV releases) that may result in significant releases of hazardous air pollutants? <i>CAA option only</i>			
3) Does the SSMP detail actions the source is taking to minimize the frequency and severity of the malfunctions? <i>CAA option only</i>			
4) Does the SSMP include a projected oxygen correction factor based on normal operations to use during periods of startup and shutdown?			

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Requirement	Yes	No	Comments
Emergency Safety Vent (ESV) Operating Plan [40 CFR 63.1206(c)(4)]			
1) Does the ESV Operating Plan include detailed procedures for:			
a) Rapidly stopping the waste feed?			
b) Shutting down the combustor?			
c) Maintaining temperature until expiration of the residence time? <i>(if feasible)</i>			
d) Maintaining negative pressure until expiration of the residence time? <i>(if feasible)</i>			
2) Does the ESV Operating Plan include calculations, information, and data documenting the effectiveness of the procedures?			
Operation and Maintenance Plan (O&MP) [40 CFR 63.1206(c)(7)]			
1) For all components of the combustor, including air pollution control equipment, does the O&MP include detailed procedures for:			
a) Operation?			
b) Inspection?			
c) Maintenance?			
d) Corrective measures?			
2) Does the O&MP ensure compliance with the startup, shutdown, and malfunction provisions?			
Continuous Monitoring Systems (CMS) Performance Evaluation Plan (PEP) [40 CFR 63.1209(a)-(b)]			
1) Does the CMS PEP include information on startup, shutdown, and malfunctions for CMS, or does it reference the SSMP?			<i>Not required to be in plan, only required to be done.</i>
2) Are necessary parts for routine repair available readily?			<i>Not required to be in plan, only required to be done.</i>
3) Is there a daily check to indicate the system is responding?			
4) Is there a written quality control program describing:			
a) Initial and subsequent calibration?			
b) Determination and adjustment of calibration drift?			
c) Preventive maintenance (including spare parts inventory)?			
d) Data recording, calculations, and reporting?			
e) Accuracy audit procedures, including sampling and analysis methods?			
e) Corrective action program?			
5) Are thermocouples calibrated at least yearly?			
6) Is there a written QC program for the CEMS detailing complete, step-by-step procedures for the following:			
a) Checks for component failures and leaks?			
b) Calibration?			
c) Calibration Drift (CD) determination and adjustment of CEMS?			

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Requirement	Yes	No	Comments
d) Integration of CEMS with the AWFCO system?			
e) Preventive Maintenance (including spare parts inventory)?			
f) Data recording, calculations, and reporting?			
g) Checks of record keeping?			
h) Accuracy audit procedures, including sampling and analysis methods?			
i) Program of corrective action?			
j) Operator training and certification?			
k) Maintaining and ensuring current certification or naming of cylinder gasses (daily and quarterly)?			
7) Is there a written QA plan for the CEMS including:			
a) QA responsibilities (including maintaining records, preparing reports, reviewing reports)?			
b) Schedules for the daily checks, periodic audits, and preventive maintenance?			
c) Checklists and datasheets?			
d) Preventive maintenance procedures?			
e) Description of the media, format, and location of all records and reports?			
f) Yearly review of CEMS data?			
8) Is there a daily calibration check for the CEMS?			
9) Is downtime due to calibration limited to 20 minutes? (This can be waived for redundant monitors as long as both are operational.)			
10) Is there a daily system audit for the CEMS including:			
a) Review of calibration check data?			
b) Inspection of the recording system?			
c) Inspection of the control panel warning lights?			
d) Inspection of the sample transport and interface system (e.g., flowmeters, filters, etc)?			
11) Is there a quarterly Absolute Calibration Audit (ACA) performed on the CEMS?			
12) Is there a yearly Relative Accuracy Test Audit (RATA) performed on the CEMS?			
Miscellaneous Requirements			
1) Does the operating record include the calculation of the hazardous waste residence time?			
2) Does the operating record include information on control of combustion system leaks, e.g. operation under negative pressure, totally sealed unit, etc.?			

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3) Is weekly testing of the AWFCO system performed? <i>This can be waived if the facility documents that weekly testing will unduly restrict or upset operations.</i>			
4) Does the operating record include corrective measures taken after an ESV opening?			
5) Does the operating record include information on the required maintenance performed on air pollution control and monitoring equipment?			
6) Does the operating record include information on actions taken during startup, shutdown, and malfunctions that differ from those specified in the SSMP?			
7) Does the operating record include documentation on periods when a CMS is malfunctioning or inoperative (including date and time)?			
8) Does the operating record include results of performance tests and CMS performance evaluations?			
9) Does the operating record include CMS calibration checks?			
10) Does the operating record include adjustment and maintenance performed on CMS?			
11) Does the operating record include all required CMS measurements?			
12) Does the operating record include the date and time of commencement and completion of each period of excess emissions and parameter monitoring exceedances that occurs during startup, shutdown, and malfunctions?			
13) Does the operating record include the date and time of commencement and completion of each period of excess emissions and parameter monitoring exceedances that occurs during times other than startup, shutdown, and malfunctions?			
14) Does the operating record include the nature and cause of all malfunctions?			
15) Does the operating record include corrective action taken or preventive measures adopted after a malfunction?			
16) Does the operating record include the nature of repairs or adjustments to CMS that are inoperative or out-of-control?			

HWC MACT Compliance Checklist - Operating Parameters

Unit Name

Requirement	Yes	No	Observed Cut Off Limit	Comments
1) Is each OPL continuously monitored and recorded?				
2) Is the CO concentration of the stack less than 100 ppmv, HRA?				
3) Is the combustion chamber temperature greater than XXXX C, HRA?				
4) Is the flue gas flowrate less than XXXXXX lb/hr, HRA?				
5) Is the hazardous waste feedrate less than XXXX lb/hr, HRA?				
6) Is the feedrate of total mercury less than XXX, 12-HRA?				
7) Is the feedrate of SVM (Cd and Pb) less than XXX, 12-HRA?				
8) Is the feedrate of LVM (As, Be, and Cr) less than XXX, 12-HRA?				
9) Is the feedrate of ash less than XXX lb/hr, 12-HRA?				
10) Is the feedrate of total chlorine less than XXXX lb/hr, 12-HRA?				
11) Is the pressure drop across the chlorine scrubber greater than XX inches of water, HRA?				
12) Is the chlorine scrubber freshwater make-up rate greater than XXX gpm, HRA?				
13) Is the HCl absorber freshwater make-up rate greater than XXX gpm, HRA?				
14) Is the pH of the scrubber liquor greater than XXX, HRA?				