COMPLIANCE TEST REPORT DETERMINATION OF CYLINDER GAS AUDIT ACCURACY FOR THE DRYER RTO STACK CO MONITOR, DRYER RTO STACK VOC MONITOR AND PRESS STACK VOC MONITOR



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4111 West Four Mile Road Grayling, Michigan 49738

Prepared by:

Faith Dandois Environmental, Health, and Safety Coordinator Weyerhaeuser Company

Third Quarter, 2015



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RENEWABLE OPERATING PERMIT REPORT CERTIFICATION

AIR QUALITY DIVISION

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Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating (RO) Permit program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as described in General Condition No. 22 in the RO Permit and be made available to the Department of Environmental Quality, Air Quality Division upon request.

| Source Name Weyerhaeuser Company | County Crawford | | | | | |
|--|---|--|--|--|--|--|
| Source Address _ 4111 West Four Mile Road (| ity Grayling | | | | | |
| AQD Source ID (SRN) B7302 RO Permit No. MI-ROP-B7302-2010 | RO Permit Section No. 1V | | | | | |
| Please check the appropriate box(es): | | | | | | |
| Annual Compliance Certification (General Condition No. 28 and No. 29 of the RO Permit) | | | | | | |
| Reporting period (provide inclusive dates): From To 1. During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the RO Permit, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the RO Permit. | | | | | | |
| 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the RO Permit, each term and condition of which is identified and included by this reference, EXCEPT for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the RO Permit, unless otherwise indicated and described on the enclosed deviation report(s). | | | | | | |
| | | | | | | |
| Semi-Annual (or More Frequent) Report Certification (General Condition No. 23 of Reporting period (provide inclusive dates): From To 1. During the entire reporting period, ALL monitoring and associated recordkeeping read and no deviations from these requirements or any other terms or conditions occurred. 2. During the entire reporting period, all monitoring and associated recordkeeping requirements or any other terms or conditions occurred, EXCE enclosed deviation report(s). | quirements in the RO Permit were met irements in the RO Permit were met and PT for the deviations identified on the | | | | | |
| M Other Report Cortification | | | | | | |
| Reporting period (provide inclusive dates): From <u>07/01/15</u> To <u>09/</u> Additional monitoring reports or other applicable documents required by the RO Permit ar Compliance Test Report, CGA for Press and Dryer VOC monitors and | 30/15 e attached as described: Dryer CO monitor. | | | | | |
| | and a second | | | | | |

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete.

| Rina Allen | Plant Manager | (989) 348-3401 |
|--|---------------|----------------|
| Name of Responsible Official (print or type) | Title | Phone Number |
| Sincally | | 9/29/15 |
| Signature of Responsible Official | | Dale |

Signature of Responsible Official

* Photocopy this form as needed.

EQP 5736 (Rev 9/01)

1.0 INTRODUCTION

Cylinder Gas Audit (CGA) testing was conducted by Weyerhaeuser personnel on the gaseous emissions monitors servicing the Dryer RTO Stack and Press Stack. These tests involved the volatile organic compound (VOC) monitoring system on the Press Biofilter exhaust, and the carbon monoxide (CO) and VOC monitoring systems for the Dryer RO exhaust. The Press audits and the Dryer audits were conducted on September 25th, 2015, satisfying the quality assurance/quality control requirements for these monitoring systems for the third quarter of 2015.

2.0 SUMMARY OF RESULTS

The results of the three CGA Tests are provided in Appendix A of this report. The results present the times for each of the tests, calibration gas concentrations and monitoring system responses. Calculations of CGA Accuracies are provided in Appendix B. All accuracies were within the allowable limit of plus or minus (+/-) 5% for VOC (EPA/530-SW-91-010, Sec.2.2.4.7) and plus or minus (+/-) 15% for CO (40CFR60, App. F, Sec. 5.2.3 (2)). The results are summarized in the table below.

| Monitor | Audit Point | | | |
|-------------------|-------------|--------|--------|--|
| | Zero | Mid | High | |
| Press VOC | 0.21% | 0.07% | 0.14% | |
| Monitor | | |] | |
| Dryer VOC Monitor | 0.10% | 4.40% | 0.52% | |
| (Low Range) | | | | |
| Dryer VOC Monitor | NA | 0.04% | 0.17% | |
| (High Range) | | | | |
| Dryer CO Monitor | NA | 0.365% | 0.246% | |
| - | | | | |

Emissions Monitor CGA Accuracies Weyerhaeuser, Grayling

3.0 PROCEDURES

3.1 Methods

The procedures outlined in USEPA Publication EPA/530-SW-91-010, "Methods Manual for Compliance with the BIF Regulations", Section 2.2.6.3, "Calibration Error Test Procedure" were used for auditing the Press and Dryer VOC monitors. The procedures outlined in 40 CFR 60, Appendix F, Section 5.1.2 were used for auditing the Dryer CO monitor.

3.2 Cylinder Gas Audit

All of the monitors were challenged with audit gases of known concentration at three (3) points. Audit gases were introduced three (3) times at each audit point for a sufficient period of time to assure that adsorption/desorption of the sample transport surfaces had stabilized. Each monitor operated in the normal sampling mode during the audit. Audit gases were introduced to the monitor calibration gas line, which delivered the audit gas to the sample gystem at a point between the stack sample probe and sample line. A flow meter was used to assure that the audit gas into the monitors was confirmed to be that of the normal value.

The Dryer CO monitor was challenged with 277 ppm, 126.3 ppm, and zero gases. The Dryer VOC monitor was challenged with 749.8 ppm, 352.1 ppm, 72.48 ppm, 34.93 ppm and zero gas in order to completely audit both spans of this dual range instrument. The press VOC monitor was audited against gases of 81.11 ppm, 34.95 ppm and zero. All audit gases were prepared in accordance with EPA Traceability Protocol No. 1. Certificates of analysis for these gases are provided in Appendix C of this report.

3.3 Calculations

Calibration Error calculations for the VOC monitors followed EPA/530-SW-91-010, "Methods Manual for Compliance with the BIF Regulations", Section 2.2.6.3.2. Calculations for the CO monitor followed 40 CFR 60, Appendix F, Section 6.3.