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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AIR QUALITY DIV.

4111 West Four Mile Road Grayling, Michigan 49738

Prepared by:

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Second Quarter, 2017



REPORT CERTIFICATION

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 _C	rawford		
Source Address 4111 West Four Mile Road	City Grayling			
AQD Source ID (SRN) B7302 RO Permit No. MI-ROP-	B7302-2016a RO Permit S	Section NoIV		
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 1. During the entire reporting period, this source was in compliance each term and condition of which is identified and included by this reis/are the method(s) specified in the RO Permit. 2. During the entire reporting period this source was in compliance term and condition of which is identified and included by this refer deviation report(s). The method used to determine compliance for Permit, unless otherwise indicated and described on the enclosed of the semi-Annual (or More Frequent) Report Certification (General Reporting period (provide inclusive dates): From 1. During the entire reporting period, ALL monitoring and associated and no deviations from these requirements or any other terms or condition deviations from these requirements or any other terms or conditional deviation report(s).	with all terms and conditions contained ence, EXCEPT for the deviations ide reach term and condition is the met eviation report(s). Condition No. 23 of the RO Permit To To To To The requirements in the enditions occurred. To The recordkeeping requirements in the Roman Records and the Roman Records are conditions occurred.	d in the RO Permit, each entified on the enclosed thod specified in the RO RO Permit were met		
☑ Other Report Certification				
Reporting period (provide inclusive dates): From 04/01/17 Additional monitoring reports or other applicable documents required to Compliance Test Report, CGA for Press and Dryer VC				
certify that, based on information and belief formed after reasonable incomporting enclosures are true, accurate and complete. Rina Allen Plant		n in this report and the		
Name of Responsible Official (print or type) Title		Phone Number		
Line allu		6/23/17		
Signature of Responsible Official	Dat	te		

^{*} Photocopy this form as needed.

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1.0 INTRODUCTION

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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 were conducted on June 22nd and the Dryer audits were conducted on June 15, 2017, satisfying the quality assurance/quality control requirements for these monitoring systems for the second quarter of 2017.

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.

Emissions Monitor CGA Accuracies Weyerhaeuser, Grayling

Monitor	Audit Point			
	Zero	Mid	High	
Press VOC	0.00%	0.04%	0.03%	
Monitor				
Dryer VOC Monitor	0.09%	2.45%	1.59%	
(Low Range)				
Dryer VOC Monitor	NA	0.15%	0.13%	
(High Range)				
Dryer CO Monitor	NA	-0.40%	0.045%	
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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 gasses were introduced to the monitor calibration gas line, which delivered the audit gas to the sampling system 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 279 ppm, 125 ppm, and zero gases. The Dryer VOC monitor was challenged with 744.8 ppm, 352.1 ppm, 75.15 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 81.53 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.