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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Weyerhaeuser

4111 West Four Mile Road
Grayling, Michigan 49738

Prepared by:

Kathi Moss
Environmental Manager
Weyerhaeuser NR Company

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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 Dryer audits were conducted on June 19, 2018 and Press audits were conducted on June 20, 2018, satisfying the quality assurance/quality control requirements for these monitoring systems for the second quarter of 2018.

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 Monitor	0.09%	0.35%	0.36%
Dryer VOC Monitor (Low Range)	0.42%	0.87%	0.01%
Dryer VOC Monitor (High Range)	NA	0.28%	1.02 %
Dryer CO Monitor	NA	2.86%	1.01%

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 274 ppm, 125.9 ppm, and zero gases. The Dryer VOC monitor was challenged with 747 ppm, 352.1 ppm, 75 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 82.57 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.