

H & H MONITORING, INC.

DETERMINATION OF VOC CAPTURE EFFICIENCY COATING LINE NOS. 27 AND 29

PREPARED FOR:

**CURTIS METAL FINISHING COMPANY
STERLING HEIGHTS PLANT
STERLING HEIGHTS, MICHIGAN**

SUBMITTED:

**AUGUST 1, 2014
HHMI PROJECT NO. 1402-001**

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2.0 PROCESS DESCRIPTION

The abatement system controls VOC emissions from Lines EUDIPSPIN27 and EUDIPSPIN29. VOC emitted from the coating lines is controlled by a Durr Environmental RTO. Lines EUDIPSPIN27 and EUDIPSPIN29 each have a part coating area that utilizes a dip/spin system to coat small metal parts. The VOC emissions from these dip/spin lines are controlled separately from the other dip/spin lines at the facility. Parts are loaded into a basket by weight. The basket is held steady as the dip tank or vat is raised such that the parts in the basket are fully submerged in the coating material. The vat is then partially lowered such that the parts are no longer submerged but remain in the vat. The basket is then spun to remove excess coating material from the parts. The excess coating material that is spun off of the parts remains in the vat for use in coating subsequent cycles. The parts are then placed onto a conveyor line that passes them through a flash-off area and subsequently into a curing oven.

Emissions from Lines EUDIPSPIN27 and EUDIPSPIN29 are captured independently of the other coating lines and directed to an exhaust header that leads to the RTO. The RTO operates at a temperature of 1500 °F with a retention time of 0.5 seconds. Material usage data from each dip/spin coating line was recorded along with RTO chamber temperature, which are included in Appendix F.

3.0 SAMPLING AND ANALYTICAL PROCEDURES

Total VOC was measured in the ductwork leading to the exhaust header and the RTO exhaust stack to determine capture and destruction efficiency. Coating material usage and VOC input was measured concurrently with RTO ductwork exhaust gas VOC to determine capture efficiency.

Capture efficiency (CE) was determined using an alternative protocol that included using the liquid/gas VOC measurement techniques. Procedures employed for this study were conducted in accordance with the following applicable USEPA reference methodologies:

- Methods 1 and 2 to determine exhaust gas volumetric flow rates.
- Method 3 to determine exhaust gas molecular weights.
- Method 4 to determine exhaust gas moisture content.
- Method 24 to determine percent solids and volatile materials content in the coating materials, as required by Method 204F.
- Method 25A to determine VOC emissions captured by the abatement system.
- Method 204F to determine VOC analyzer response factors and VOC in the coating materials.

Descriptions of the procedures and methodologies performed to complete this testing project are presented individually in the following sub-sections.

3.1 DESTRUCTION EFFICIENCY

Destruction efficiency (DE) is expressed as the ratio of the difference between the measured inlet and outlet mass VOC emission rates divided by the mass VOC emission rate measured at the inlet.

The RTO DE determination of VOC emissions was conducted in accordance with USEPA Reference Methods. Because the VOC emitted from the RTO was expected to be less than 50 ppm, Method 25A was used. Four test runs of approximately 180 minutes were performed, in accordance with compliance testing requirements. Corresponding exhaust gas volumetric flow rate and moisture content determinations were made for each test run at the RTO inlet and outlet sampling locations.

HHMI utilized total hydrocarbon analyzers at the RTO inlet and outlet to obtain VOC measurements. Based on these measurements for each test run, the DE was calculated.

3.2 CAPTURE EFFICIENCY

Capture efficiency (CE) is expressed as the captured mass VOC in the captured air stream, determined during the test, divided by the mass VOC measured to be utilized by the coating lines, during the test.

The CE of VOC emissions by the abatement system was conducted in accordance with USEPA Reference Methods. For the purpose of this study, HHMI performed four test runs of approximately 180 minutes each. Sampling for VOC was performed in the main combined exhaust ductwork (captured gas stream) upstream of the RTO. Corresponding exhaust gas volumetric flow rate and moisture content determinations were made at the sampling location.

Coating material usage rates were determined using the weight difference procedure detailed in Method 204F. Vat and coating weights were determined before and after each test run using a calibrated scale. Coating material composition and quantity in the vat were adjusted prior to the sample collection and pre-test weight measurement and immediately following post-test weight measurement and sample collection.

Coating material samples collected during the testing were analyzed to determine VOC content as propane. Data resulting from these analyses were utilized to calculate total VOC input as propane for each test run.

3.2 SAMPLING LOCATIONS

Test ports are installed on the 36-inch diameter combined main exhaust ductwork upstream of the RTO. The ports are located 180 inches (5.0 duct diameters) downstream from a duct pantleg and 120 inches (3.33 duct diameters) upstream from 90° elbow .

Test ports are installed on the 24-inch by 42-inch rectangular exhaust stack from the RTO. The ports are located 258 inches (8.44 duct diameters) downstream from a 90° duct elbow and 312 inches (10.34 duct diameters) upstream from the stack exit to atmosphere.

3.3 USEPA TEST METHODS AND PROCEDURES

Testing procedures employed during the performance of this study were conducted in accordance with USEPA Methods 1, 2, 3, 4, 25A, and 204F. A summary of the test procedures is presented below.

Method 1, "*Sample and Velocity Traverses for Stationary Sources*," was used to determine the number of traverse points for flow rate measurement at each sampling location. The number of upstream and downstream stack/duct diameters from the sampling ports to the nearest flow disturbance was determined. Based on these determinations, the appropriate number of traverse points was chosen for the purpose of determining the volumetric flow rate of the flue gas. The sample port locations and the upstream and downstream stack diameters are depicted in Figures 1 and 2.

Method 2, "*Determination of Stack Gas Velocity and Volumetric Flow Rate (Type-S Pitot Tube)*," was used to measure velocity pressures and temperatures at each traverse point. A calibrated Type-S pitot tube equipped with a thermocouple was positioned at each of the traverse points and the exhaust gas temperature and velocity pressure were measured and recorded. The Type-S Pitot tube was calibrated in accordance with the specifications outlined in Method 2. Measurement readings were made on a manometer capable of measuring to the nearest 0.01 inch of water. Temperature readings were made on a calibrated pyrometer.

The average stack gas velocity is a function of average velocity pressure, absolute stack pressure, average stack temperature, molecular weight of the wet stack gas, and Pitot tube coefficient. Determination of average stack gas velocity was performed in accordance with equations presented in Method 2. Actual exhaust gas flow rate was determined from the average stack gas velocity and stack dimensions. Exhaust gas flow rate data from the stack are presented in Appendix C.

Method 3, (*Gas Analysis for the Determination of Dry Molecular Weight*), was used to determine the molecular weight of the flue gas. Grab samples of the exhaust gas were collected in and analyzed for oxygen (O₂) and carbon dioxide (CO₂) concentrations using a Fyrite Combustion gas analyzer.

The dry molecular weight of the stack gas was calculated based on the assumption that the primary constituents are oxygen, carbon dioxide, and nitrogen (other compounds present have a negligible relative effect on molecular weight). Having measured the oxygen and carbon dioxide concentrations, the percent stack gas was then equal to the sum of each constituent compound's molecular weight (lb/lb-mole) multiplied by its respective concentration.

Method 4, "*Determination of Moisture Content in Stack Gases*," was used to measure the moisture in the exhaust gases at the sampling location. A gas sample was extracted from the stack/duct and moisture present in the gas sample was condensed in a series of impingers. The impingers each contained a known weight of water or silica gel prior to the start of each test run. At the conclusion of each test run, the post-test weights of the impingers were recorded.

The percent of moisture in the exhaust gas was determined based on the volume of gas sampled and water condensed. The percent moisture by volume of the exhaust gas, at standard temperature and pressure (68 degrees Fahrenheit and 29.92 inches of mercury), was determined in accordance with equations presented in Method 4. Moisture data from the source is shown in the Results Tables. A sketch depicting the Method 4 sampling train is presented in Figure 4.

Method 25A, "*Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer*," was used to measure VOC emissions concentrations exhaust ductwork. A JUM Engineering, Model VE-7 flame ionization detector (FID) was used to conduct testing exhaust ductwork. Continuous samples were withdrawn from the sample location through a probe, heated sample line, and pump prior to being subjected to the ionization flame.

The JUM VE-7 directs a portion of the sample through a capillary tube to the FID that

ionizes the hydrocarbons to carbon. The detector determines the carbon concentration in terms of parts per million (ppm). The concentration of VOC was then converted to an analog signal (voltage) and recorded on a computerized data acquisition system at 5-second intervals. The data were then averaged over the test period to determine the concentration for VOC reported as equivalent units of the calibration gas (propane). Final results used in determining capture efficiency were converted in accordance with Method 25A and reported in terms of carbon. A sketch depicting the JUM VE-7 measurement train is presented in Figure 3.

Method 204F, *"Volatile Organic Compounds Content in Liquid Input Stream (Distillation Approach)"*, was used to determine the VOC content of the coating material. The material usage volume was calculated based on the diameter of the vat and the difference in liquid levels in the vat from the beginning to the end of each test run.

This study utilized the weight determination procedure to determine the weight of coating material used for each test run by each coating line. Three sets of coating samples were collected, one for Method 24 analyses, one for Method 204F distillation and one as a backup. The coating samples collected from each line were uniquely labeled and logged into a sample custody system. One set of samples was transported to Data Analysis Technology, Inc. (DAT) for distillation. The second set of samples was retained by HHMI for Method 24 volatile matter analysis. The third set was retained by CMFC as backup in the case of a lost or damaged sample.

The distillate from each coating sample was used to generate a known concentration of VOC in a Tedlar bag. Bag generation was accomplished by withdrawing a small amount of distillate into a syringe. The syringe was weighed; the contents expelled into a volatilization chamber and collected in the sample bag along with a known volume of zero air. The syringe was again weighed to obtain the weight of distillate volatilized into the bag. The VOC in the sample bag was then subjected to a FID to measure the VOC content in the sample bag. The known weight of VOC material in the sample bag was then compared to the measured weight of VOC in the sample bag in terms of propane. This ratio is expressed as the response factor. The amount of VOC introduced to each coating line is calculated based on the weight of the coating material used and its VOC content as propane utilizing the response factor. By utilizing the response factor, the units of VOC measurement for both the VOC in the coating and VOC measured in the exhaust stream,

can be expressed in similar terms of propane.

Capture efficiency was then determined as the ratio of mass of VOC measured in the exhaust stream, to the mass of VOC introduced to the coating lines.

4.0 DISCUSSION OF RESULTS

The VOC capture and destruction efficiency, and material usage rates for each test run are shown in the Tables tab in this report. Supplemental information for each test run is provided with the field data and calculation information in Appendix C. Analytical results for coating sample analyses are presented in Appendix D.

It should be noted that the results for Runs 2 and 3 both exceeded 100% CE. Run 2 had a CE of 118% and was not included in the calculation of the average CE for the test series.

Based on the results (Runs 1 and 3) of this VOC capture efficiency study, the VOC abatement system installed on Coating Line Nos. 27 and 29 had an overall control efficiency of 97.6%. VOC destruction efficiency averaged 98.1% and capture efficiency averaged 99.5%.

5.0 QUALITY ASSURANCE

Quality assurance (QA) objectives required for this study followed applicable criteria detailed by each method used per the facility's test plan dated March 26, 2014, approved by MDEQ. The following sub-sections detail specific QA limitations and this study's compliance with those limitations.

5.1 FIELD EQUIPMENT

Where applicable, reference method QA control procedures were followed to demonstrate creditability of the data developed. Quality assurance information for field equipment is provided in Appendix B. The procedures included, but were not limited to, the following:

- Sampling equipment was calibrated according to procedures contained in the "Quality Assurance Handbook for Air Pollution Measurement Systems, Volume III," EPA 600/4-72-b, September 1994.
- The sample trains were configured according to the appropriate test methods.
- Quality control checks of sample trains were performed on-site, including sample train and Pitot tube leak checks.
- VOC FIDs used for the onsite testing were calibrated in accordance with USEPA Method 25A. Calibration error was within the allowable limit of 5% of calibration gas value. Zero and calibration drift were both within the allowable limit of 3% of analyzer span for all CE test runs. Span drift failed for Run 4 CE instrument. FID response times (0-95% of span) were within the allowable 30 seconds, as required.

The CE for Run 2 was not used due to the result being 118%.

As approved onsite by Tom Maza (MDEQ), Run 3 was interrupted because the second shift operator began production before the oven was empty and baseline concentration of the captured gas stream was achieved. The captured gas stream concentration at the time the operator began production, was at 50 ppm. The concentration was monitored and the test was resumed when the captured gas stream concentration again reached 50 ppm and trending toward baseline

concentration.

Calibration data for this study are presented in Appendix B.

5.2 ANALYTICAL DATA

Quality assurance procedures detailed in USEPA Methods 24 and 204F were performed. For Method 24 duplicate samples for volatile matter were analyzed with results falling within stipulated quality assurance criteria.

For Method 204F, VOC FID was calibrated in accordance with the method. Calibration error was within the allowable limit of 3% of calibration gas value. Zero and calibration drift were both within the allowable limit of 3% of analyzer span for all samples. Zero air was passed through the bag generation apparatus and analyzed to confirm no contamination was present.


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6.0 LIMITATIONS


This report is provided to Curtis Metal Finishing Company in response to a limited assignment. HHMI will not provide any information contained in, or associated with, this report to any unauthorized party without expressed written consent from Curtis Metal Finishing Company, unless required to do so by law or court order. HHMI accepts responsibility for the performance of the work, specified by the limited assignment, which is consistent with others in the industry, but disclaims any consequential damages arising from the information contained in this report.

This report is intended solely for the use of Curtis Metal Finishing Company. The scope of services performed for this assignment may not be appropriate to comply with the requirements of other similar process operations, facilities, or regulatory agencies. Any use of the information or conclusions presented in this report, for purposes other than the defined assignment, is done so at the sole risk of the user.

This emission testing survey was conducted and report developed by the following H & H Monitoring, Inc. personnel:


Brad Wallace
Technician


Mike Stockwell
Site Leader


Daniel L. Hassett
President

TABLES

TABLE 1

**VOC CAPTURE AND OVERALL CONTROL EFFICIENCY
COATING LINE NOS. 27 AND 29
CURTIS METAL FINISHING COMPANY
STERLING HEIGHTS, MICHIGAN
MAY 2014**

Run No.	1	2	3	Average (Runs 1 and 3)
Date	5/20/2014	5/20/2014	5/20/2014	
Start Time	7:45	10:45	13:40	
Stop Time	10:16	13:21	16:29	
Test Duration (mins)	151	155	145	
FLUE GAS FLOWRATES AND VOC				
SCFM	10,891	11,161	10,877	10,976
VOC concentration (ppm)	180.90	209.70	188.60	193.07
VOC emission rate (lb/hr)	13.53	16.15	13.90	14.53
VOC in the Captured Air Stream (lbs)	34.05	41.72	33.60	36.46
COATING LINE VOC INPUT (LBS)				
Line 27 VOC input	15.77	16.22	17.97	16.65
Line 29 VOC input	19.51	19.14	14.83	17.83
VOC Input During Test	35.28	35.36	32.80	34.48
TOTAL VOC CAPTURE EFFICIENCY	96.5%	118.0%	102.4%	99.5%
OXIDIZER DESTRUCTION EFFICIENCY				98.1%
OVERALL CONTROL EFFICIENCY				97.6%
PERMITTED VOC CONTROL LIMIT				81.0%

Notes: (1) Run 3 was paused from 15:59 to 16:21 due to second shift operator beginning production on Line 27. The captured VOC concentration was at 50 ppm when he started. After being asked to stop the concentration was monitored until it again reached 50 ppm at which time the test was resumed. (2) Run 2 was omitted from the average calculation as the CE was greater than 105% per USEPA document GD-35.

TABLE 2

VOC DESTRUCTION EFFICIENCY

LINES 27 AND 29

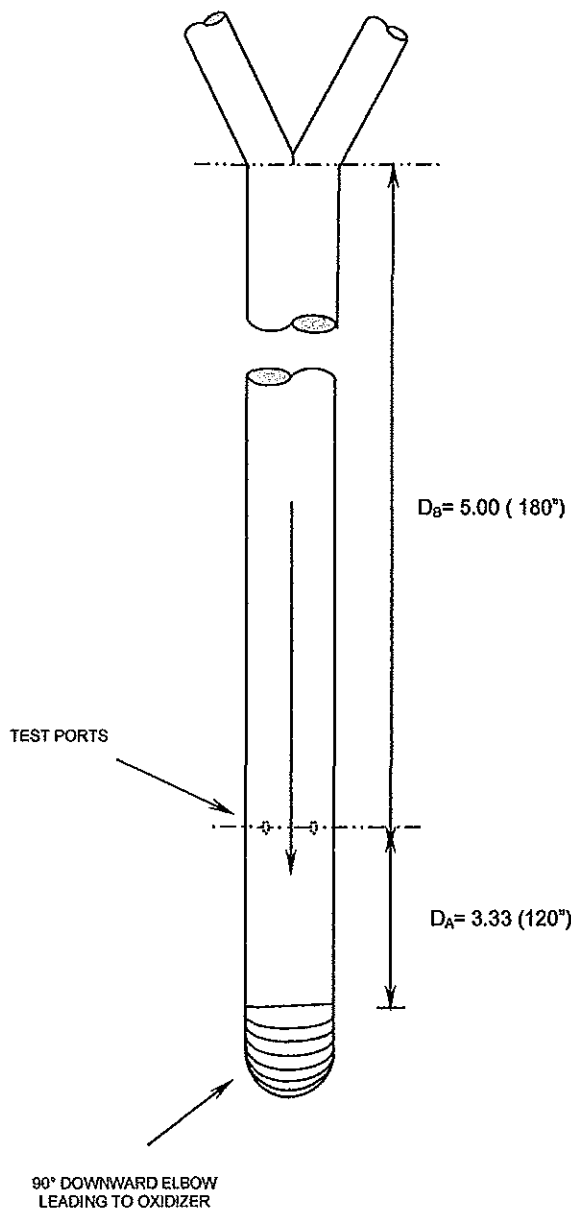
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STERLING HEIGHTS, MI

May 2014

Run No.	1	2	3	Average
Date	5/20/2014	5/20/2014	5/20/2014	
Start Time	8:30	11:00	14:15	
Stop Time	9:30	12:00	15:15	
FLUE GAS FLOWRATES AND VOC				
Inlet				
ACFM	13,818	14,174	13,691	13,894
SCFM	10,900	11,245	10,737	10,961
DSCFM	10,780	10,959	10,636	10,792
VOC (ppm)	206.0	282.2	236.5	241.6
VOC (lb/hr)	15.42	21.79	17.44	18.21
Outlet				
ACFM	15,584	15,921	15,547	15,684
SCFM	10,852	11,153	10,877	10,961
DSCFM	10,768	11,066	10,522	10,785
VOC (ppm)	8.34	2.51	2.15	4.33
VOC (lb/hr)	0.621	0.192	0.161	0.325
DESTRUCTION EFFICIENCY	96.0%	99.1%	99.1%	98.1%

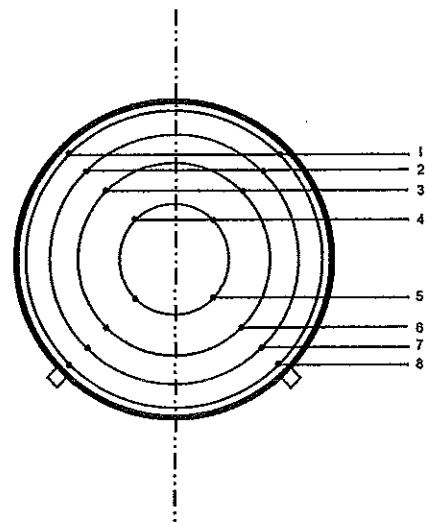
FIGURES



Plan View

NO SCALE

Traverse Point Locations	
Stack Dia.:	36.0"
Point #	Distance from Stack wall
1	1.15
2	3.78
3	6.98
4	11.63
5	24.37
6	29.02
7	32.22
8	34.85



Elevation View

FIGURE 1
TEST PORT AND TRAVERSE POINT LOCATION
RTO INLET

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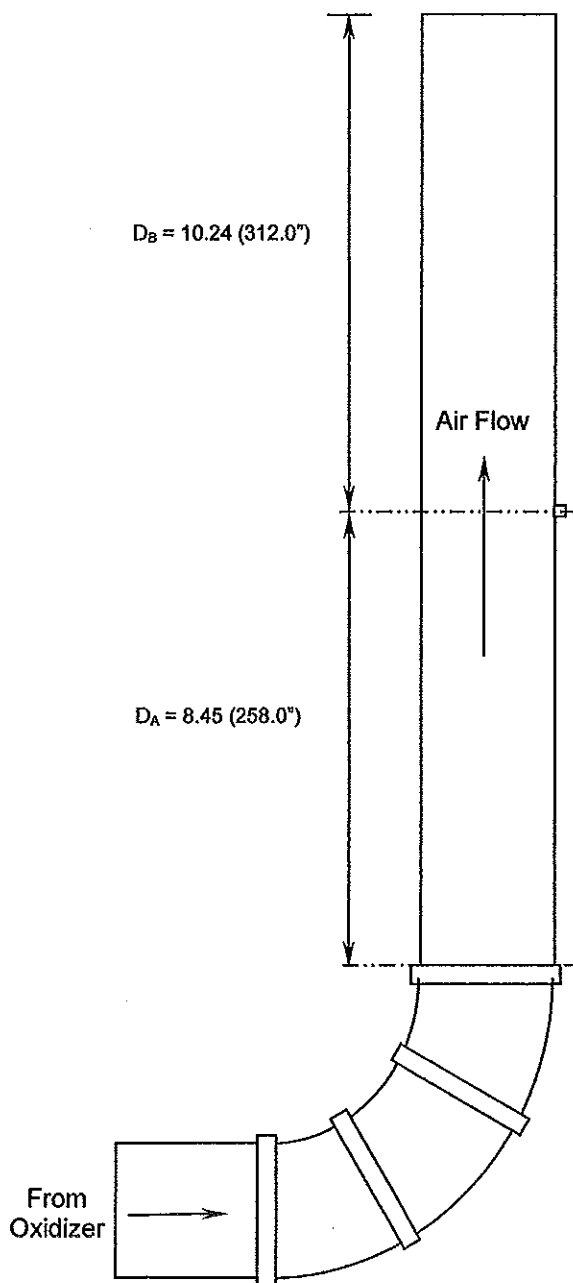
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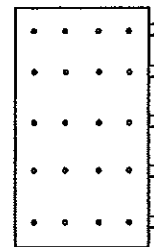
JOB NO. 1402-001

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1402001-1

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ELEVATION VIEW
NO SCALE



Traverse Point Matrix

Traverse Point Locations	
Stack Dimensions.:	42.0" X 24.0"
Point #	Distance from Stack wall
1	3.00
2	9.00
3	15.00
4	21.00

FIGURE 2	
TEST PORT AND TRAVERSE POINT LOCATION RTO OUTLET	
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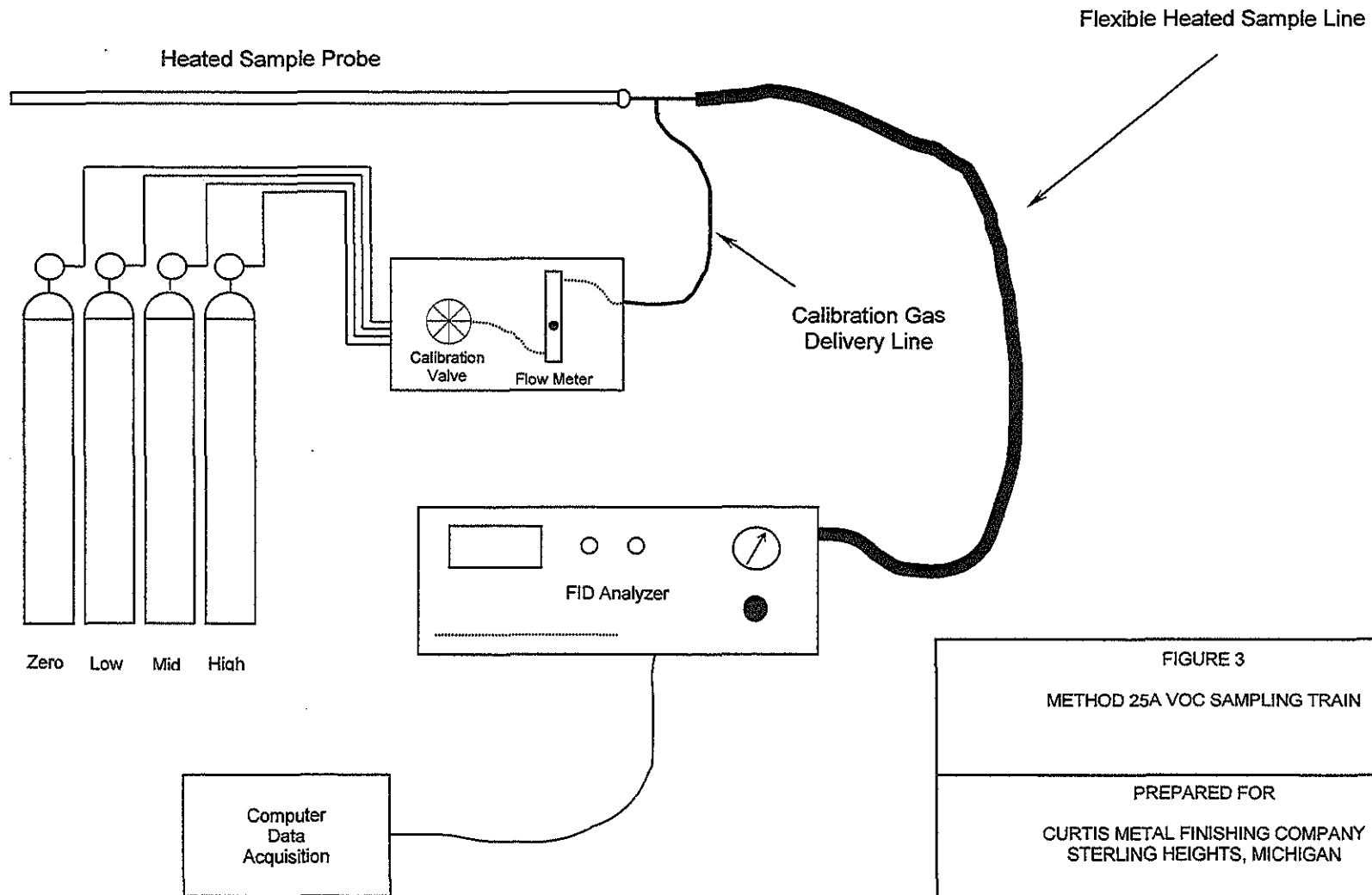


FIGURE 3
METHOD 25A VOC SAMPLING TRAIN

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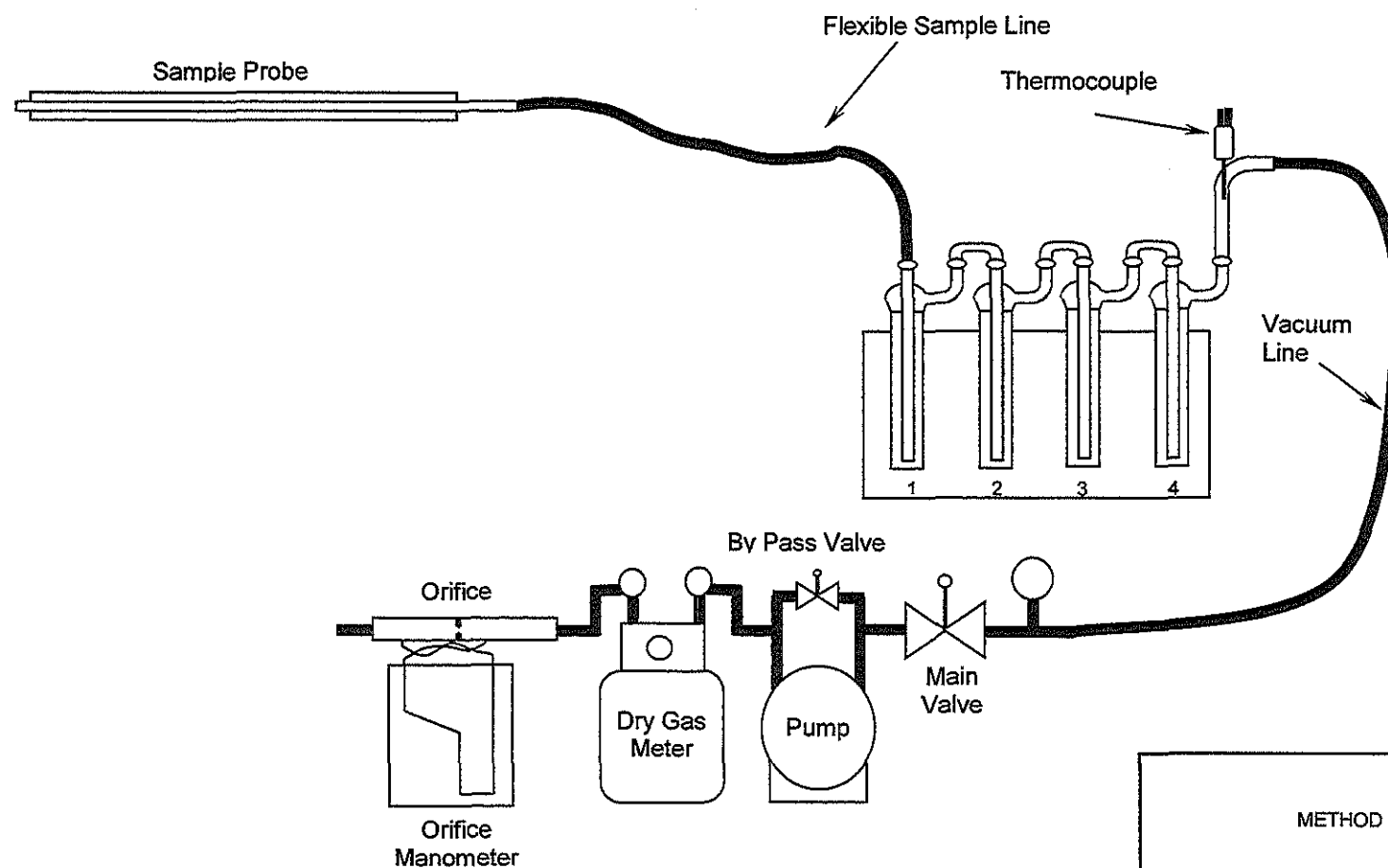
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Impinger #1 : 100 ml H₂O
 Impinger #2 : 100 ml H₂O
 Impinger #3 : Empty
 Impinger #4 : Silica Gel

FIGURE 4
 METHOD 4 SAMPLING TRAIN

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