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BOILER MACT TEST REPORT
No. 11 BOILER
AT
ESCANABA PAPER COMPANY
ESCANABA, MICHIGAN
PROJECT ID: KR- 9563

PREPARED FOR:



VERSO

Escanaba Paper Company

7100 COUNTY ROAD 426

ESCANABA, MICHIGAN 49829

PREPARED BY:

ADVANCED INDUSTRIAL RESOURCES, INC.

3407 NOVIS POINTE

ACWORTH, GEORGIA 30101

Test Date:

AUGUST 30-31, 2016



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
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 Permit (ROP) 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 specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name Verso Corportaion - Escanaba Paper Company County Delta

Source Address 7100 County Rd 426, PO Box 757 City Escanaba

AQD Source ID (SRN) A0884 ROP No. MI-ROP-A0884-2016 ROP Section No. 1

Please check the appropriate box(es):

Annual Compliance Certification (Pursuant to Rule 213(4)(c))

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 ROP, 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 ROP.

2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, 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 ROP, unless otherwise indicated and described on the enclosed deviation report(s).

Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))

Reporting period (provide inclusive dates): From _____ To _____

1. During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met 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 in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report(s).

Other Report Certification

Reporting period (provide inclusive dates): From 1/1/2016 To 12/31/2016

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

40 CFR 63 Subpart DDDDD No. 9 Boiler MACT Performance Test Report, September 2016

40 CFR 63 Subpart DDDDD No. 11 Boiler MACT Performance Test Report, August 2016

- Testing was conducted in accordance with the approved test plans and sources were

operating under maximum routine operating conditions.

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

<u>Matt Archambeau</u>	<u>Mill Manager</u>	<u>906-233-1660</u>
Name of Responsible Official (print or type)	Title	Phone Number
		<u>10/26/16</u>
Signature of Responsible Official		Date

* Photocopy this form as needed.

1.0 INTRODUCTION

1.1 SUMMARY OF TEST PROGRAM

The Verso Corporation operates The Escanaba Paper Company (EPC) pulp and paper mill in Escanaba, Michigan. Processes at the facility include the No. 11 Boiler. The facility is operated under the Michigan Department of Environmental Quality (MDEQ) issued Renewable Operating Permit (ROP) Number MI-ROP-A0884-2016. The No. 11 Boiler is also subject to the operational and emission limits established under 40 CFR 63 Subpart DDDDD – *NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*.

This document describes the test report for establishing compliance with the applicable emissions limits set-forth in the referenced NESHAP guidance as well as establishing source and control device operational limitations and ranges.

Testing was conducted on the No. 11 Boiler exhaust duct and stack to quantify the emissions of particulate matter (total filterable), carbon monoxide, hydrogen chloride, and mercury.

The field sampling portion of the test program was conducted on August 30-31, 2016, in accordance with the site-specific Test Plan submitted to the MDEQ. All test methods and procedures were performed by Advanced Industrial Resources, Inc. (AIR) in accordance with approved USEPA Methods (i.e., 40 CFR 60 Appendix A Methods 1, 2, 3a, 4, 5, 10, 19, 26A, and 30B).

1.2 KEY PERSONNEL

The key personnel who coordinated the test program and their telephone numbers are:

Paula LaFleur, Escanaba Paper Company	906-233-2603
Derek Stephens, <i>QSTI I-IV</i> , Advanced Industrial Resources	404-843-2100
Scott Wilson, Advanced Industrial Resources	800-224-5007

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2.0 PLANT AND SAMPLING LOCATION DESCRIPTIONS

2.1 PROCESS & CONTROL EQUIPMENT DESCRIPTION

Escanaba Paper Company operates a pulp and paper mill in Escanaba, Michigan. Processes at the facility include the No. 11 Boiler.

The No. 11 Boiler (EU11B68), installed 1981, modified 1986, is an ABB Combustion Engineering combination fuel boiler rated for 750,000 pounds of steam per hour (approximately 1040 million BTU per hour heat input) that provides steam for mill processes and steam turbine-generators for producing electricity. The No. 11 Boiler burns natural gas and solid fuels, which include pulverized coal, wood residue, wastewater treatment plant residuals, Tire-Derived Fuel (TDF), and non-hazardous secondary material (NHSM) engineered fuel pellets. Emissions from the No. 11 Boiler are controlled by an over-fired air system (OAF), multi-clone, and electrostatic precipitator. Opacity is monitored by a COMS which meets the design, installation, performance and certification requirements of Performance Specification 1 under Appendix B of 40 CFR 60 and the quality assurance requirements of Procedure 2 under Appendix F to 40 CFR 60. The COMS also meets the requirements of 63.7525. The boiler utilizes an oxygen trim system to maintain optimum air to fuel ratios. For purposes of Boiler MACT compliance, the No. 11 Boiler is in the *hybrid suspension/grate burners designed to burn wet biomass/bio-based solid* subcategory. The Table 2-1 summarizes the applicable Boiler MACT emissions limits and operating parameters associated with No. 11 Boiler.

Table 2-1
 Boiler No. 11 Summary of Applicable Emissions Limits and Operating Parameter

Pollutant	Emissions Limit	Control Device	Operating Parameter
Filterable PM	0.44 lb/MMBtu heat input	Multi-Cyclone, Dry ESP	Opacity
CO	3,500 ppmvd @ 3% O ₂ ^{(a),(b)}	N/A	Oxygen Trim System Set Point

Pollutant	Emissions Limit	Control Device	Operating Parameter
Hg	5.7E-06 lb/MMBtu heat input	Multi-Cyclone, Dry ESP	Hg input loading to boiler
HCl	2.2E-02 lb/MMBtu heat input	N/A	HCl input loading to boiler
All	N/A	N/A	Operating Load (as steam flow)

- (a) Emissions limits for filterable PM and CO are for boilers under the subcategory of *hybrid suspension/grate burners designed to burn wet biomass/bio-based solids*.
 (b) Parts per million by volume, dry basis, corrected to 3% oxygen concentration.

The applicable operating limits and compliance methodology for each parameter are summarized below in Table 2-2. Operating limits have been set through Initial Performance Testing and may be modified based on subsequent testing. Operational data collected during the performance test runs is included in Appendix G.

Table 2-2
 Boiler No. 11 Summary of Operating Limits

Parameter	Compliance Methodology ^(a)	Operating Limit ^(b)
Opacity	Conduct initial and annual performance testing for filterable PM. Maintain opacity to less than or equal to 10% (daily block average)	≤10%
Oxygen Content ^(b)	Conduct initial and annual performance testing for CO. Operate the oxygen trim system set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test.	2%
Operating Load	Conduct initial and annual performance testing for filterable PM, CO, Hg, and HCl. Maintain the operating load such that the 30-day rolling average steam flow rate does not exceed 110% of the highest hourly average operating load recorded during the most recent performance test.	698 KPPH (max. avg. steam flow); 767 KPPH (110% of max. avg. steam flow)
HCl Input Loading	Monitor HCl monthly pollutant loading to the boiler by monitoring each fuel type's heat input to the boiler and multiplying that by the pollutant concentration and maintain HCl loading at or below the level established during the performance test with maximum HCl loading.	3.16E-02 lbs HCl/mmBTU heat input
Hg Input Loading	Monitor Hg monthly pollutant loading to the boiler by monitoring each fuel type's heat input to the boiler and multiplying that by the pollutant concentration and maintain Hg loading at or below the level established during the performance test with maximum HCl loading.	1.75E-06 lbs Hg/mmBTU heat input

- (a) Per Boiler MACT, if your performance tests for a given pollutant for at least two (2) consecutive years show that your emissions are at or below 75% of the emissions limit for the pollutant, and if there are no changes in the operation of the individual boiler or air pollution control equipment that could increase emissions, performance test frequency for the pollutant may be decreased to once every three (3) years.
 (b) Boiler MACT does not specify specific oxygen trim system range requirements. EPC has assigned the minimum set point based on performance testing.

2.2 SAMPLING LOCATION

The sampling location for PM, HCl, and mercury emissions testing on the No. 11 Boiler exhaust is located at greater than 8.0 equivalent diameters downstream from the nearest upstream flow disturbance and at least 2.0 equivalent diameters upstream from the stack exhaust. The exhaust stack has a circular cross-section with an internal diameter of 168.0 inches. The stack has four sampling ports oriented on a 90 degree horizontal plane perpendicular to the exhaust flow direction. A schematic diagram of the sampling location is presented in Appendix D. Twelve (12) sampling points (three points per port) were used for USEPA Methods 2, 3A, 4, 5, 10, 26A, and 30B sampling, in accordance with USEPA Method 1 requirements.

The sampling location for CO emissions testing on the No. 11 Boiler exhaust is located within the duct prior to the breach of the No. 11 Boiler stack which is within the vicinity of the facility's CEMS probes and is where annual RATA certification tests are conducted. This sample location is rectangular and is equipped with a single sample port. Previous testing and certification of the facility's CEMS has indicated an absence of stratification at this sample location. Therefore, sampling was conducted within the centroidal region of the duct for Methods 3A and 10.

3.0 SUMMARY AND DISCUSSION OF TEST RESULTS

3.1 OBJECTIVES

The purpose of the testing was to establish compliance with the applicable emissions limits set-forth in the referenced NESHAP as well as to establish source and control device operational limits on the No. 11 Boiler. Testing was conducted under two (2) separate operating conditions - while firing coal, bark, and gas (Condition #1) and firing only coal and bark (Condition #2). Condition #1 was intended to maximize the boiler loading, demonstrate compliance with the Boiler MACT CO limit, and establish the minimum O₂ trim setpoint. Condition #2 was intended to demonstrate compliance with the Boiler MACT limits for Hg and HCl while burning the maximum pollutant loading fuel mixture.

3.2 FIELD TEST CHANGES, PROBLEMS, OR ITEMS OF NOTE

The testing was conducted in accordance with the Site-Specific Test Protocol submitted to the MDEQ. No problems were encountered during testing that required deviation from the planned test protocol.

Items of note include the following:

- 1) The Method 30B mercury (Hg) spiked traps were manufactured incorrectly where the sample collection direction indicator arrow was inscribed in the 'wrong' direction; therefore, field sampling was unknowingly conducted in the 'opposite' direction resulting in the Hg spiked masses effectively being in the 2nd section of the tube; therefore, Hg Spike Recoveries were assessed by adding the spiked masses (40 ng) to the traps' 1st section and conducting the Spike Recovery calculations accordingly. Due to this, 'breakthrough' determinations were not determined by the analytical laboratory. However, 'breakthroughs' on the unspiked traps were all determined to be within the necessary specifications. Additionally, if the spike mass is added to the unspiked 1st section and the breakthrough calculations are carried out accordingly, all breakthrough specifications are met. All other quality assurance specifications including 'Relative Deviation' and 'Spike Recovery' were met.

2) As indicated in the Test Plan, oxygen and carbon dioxide emission concentrations utilized to quantify the molecular weight of the exhaust stack gases as well as to determine the heat input (MMBtu/hr) using F-factor methodology were collected in integrated bag samples at the stack in the same location as the PM, HCl, and Hg emission tests. Additionally, oxygen concentrations were also collected at the 'brech' location where the CO emission concentrations were quantified so that CO emission concentrations could be corrected to 3% oxygen for reporting purposes.

3.3 PRESENTATION OF TEST RESULTS

Emission rates and concentrations are summarized and compared to NESHAP BMACT limits in Table 3-1. Complete emissions data are presented in Appendix A and Reduced and tabulated data from the field-testing is included in Appendix B. The calculations and nomenclature used to reduce the data are presented in Appendix C. Actual raw field data sheets are presented in Appendix D. Laboratory reports and custody records are presented in Appendix E.

TABLE 3-1: Results Summary - BMACT (63 DDDDD) Emission Standards

Source	Operating Condition	Pollutant	Average Measured	Allowable	Units	% of Allowable
No. 11 Power Boiler	Condition 1 (Gas, Bark, & Coal)	PM	0.002	0.44	lb / MMBtu	0.4%
		CO	1228	3500	ppm @ 3% O ₂	35%
		HCl	8.2E-03	2.2E-02	lb / MMBtu	37%
		Hg	4.2E-07	5.7E-06	lb / MMBtu	7%
	Condition 2 (Bark & Coal only)	PM	0.003	0.44	lb / MMBtu	1%
		CO	33	3500	ppm @ 3% O ₂	1%
		HCl	1.2E-02	2.2E-02	lb / MMBtu	53%
		Hg	7.1E-07	5.7E-06	lb / MMBtu	12%

3.4 PROCESS OPERATION DATA

All essential process and control device monitoring equipment was operating and data was being recorded throughout the test periods. Data collected is presented in Appendix

G and includes heat input rates per fuel type, applicable CEMS and COMS data, control device operating parameters and steam production rates.

3.5 CMS PERFORMANCE EVALUATIONS

3.5.1 Monitoring Equipment

The Escanaba Paper Company is required by 40 CFR 63.7525 and 40 CFR 63.8(e) to conduct performance evaluations on the continuous monitoring system (CMS) equipment used to demonstrate compliance with the operating limits in Table 2-2.

The CMS equipment, including performance and equipment specifications and data collection, is detailed in Tables 3-1.

Table 3-1
 Boiler No. 11 Performance and Equipment Specifications

Equipment	Type	Sample Interface	Parametric Signal Analyzer	Manufacturer Specified Accuracy	Monitor Range/ Output	Data Collection and Reduction Systems
Opacity Meter	Sick Optics OMD41 Opacity Monitor	Light transmission = transmitter/ receiver unit and reflector unit on precipitator outlet duct to stack	0-80%, 4-20 mA signal	±2% full scale	System span 0-80%/ 4-20 mA (max range 100%)	Data is collected in a DCS system. VIM software is used to reduce and manage the data from the DCS system.
Center Oxygen Meter	Rosemount 3000/3008 Probe Oxygen Sensor	Zirconia electrochemical cell positioned in the boiler	0-10%, 4-20 mA signal	0.1% of oxygen or 3% of reading (whichever is greater)	Calibrated range: 0-10% O ₂ 4-20 mA (max range 25% O ₂)	Data is collected in a DCS system. VIM software is used to reduce and manage the data from the DCS system.

Equipment	Type	Sample Interface	Parametric Signal Analyzer	Manufacturer Specified Accuracy	Monitor Range/Output	Data Collection and Reduction Systems
East and West Oxygen Meters	Yokogawa ZR22G200 SCETQEA Oxygen Sensors	Zirconia electrochemical cell positioned in the boiler	0-10%, 4-20 mA signal	Zero and span drift <2% of range maximum	Calibrated range: 0-10% O ₂ /4-20 mA (max range 25% O ₂)	Data is collected in a DCS system. VIM and PI software are used to reduce and manage the data from the DCS system.
Steam Flow Meter	Rosemount MDL3051 S1CD3A3F 12A1AB3 D2E5L4M 5	Coplanar differential pressure in steam line to distribution header	1-331" H ₂ O, 4-20 mA, 0-900 KPPH	0.025% of span	0-331" H ₂ O, 4-20 mA, 0-900 KPPH	Data is collected in a DCS system. VIM software is used to reduce and manage the data from the DCS system.

3.5.2 Evaluation Program Objective

The purpose of the CMS performance evaluation is to validate the continuous monitoring system data as required by 40 CFR 63.8(e)(3)(i) and 40 CFR 63.7525. Performance specifications typically include all the procedures for determining whether a particular CMS is capable of providing reliable measurements. In the absence of performance specifications, the monitors specified in 40 CFR 63.7525 are required to be installed, calibrated, certified, operated and maintained in accordance with the manufacturer's specifications. Consequently, the CMS performance evaluations consisted of the following the manufacturer calibration procedures and any other procedure(s) to document that the monitors meet the performance audit calibration acceptance criteria as specified in Tables 3-2.

Table 3-2
 Boiler No. 11 CMS Calibration Frequency and Calibration Acceptance Criteria

Measurement Type	Instrument Type	Calibration Frequency	Calibration Acceptance Criteria
Opacity Meter	Sick Optics OMD41 Opacity Monitor	Daily (Zero and Span)	≤ 4% Opacity
		Quarterly (Performance Audit)	Zero Compensation: ≤ 4% Opacity
			Audit Zero: ≤ 1% Opacity
			Audit Calibration Error: ≤ 3% Opacity
Annual (Zero Alignment)	Optical Alignment: Light beam outside of acceptable alignment area		
		≤ 2% Opacity	
Center Oxygen Meter	Rosemount 3000/3008 Probe Oxygen Sensor	Annual (Performance Audit)	Minimum tolerance of +/- 0.2% O ₂
East and West Oxygen Meters	Yokogawa ZR22G200SCETQEA Oxygen Sensors	Annual (Performance Audit)	Minimum tolerance of +/- 0.2% O ₂
Steam Flow Meter	Rosemount MDL3051S1CD3A3F12 A1AB3D2E5L4M5	Performance Evaluation During Scheduled Boiler Outage	Flow sensor with minimum tolerance of 2% of flow rate

3.5.3 Performance Evaluation Schedule

For equipment other than COMS, the CMS performance evaluations consisted of equipment calibration checks in the weeks prior to the performance testing. Results of performance evaluations on the oxygen sensors and steam flow meter are included in Appendix H.

As previously mentioned, the COMS equipment meets the performance evaluations requirements of Performance Specification 1 under Appendix B of 40 CFR 60 and the quality control and assurance requirements of Procedure 3 under Appendix F to 40 CFR 60. Quality assurance and quality control procedures, including calibrations and audits, are conducted according the frequencies specified in Procedure 3.

4.0 SAMPLING AND ANALYTICAL PROCEDURES

Emission rate testing was performed on the No. 11 Power Boiler exhaust in accordance with 40 *CFR* 60 Appendix A. Specifically:

- EPA Method 1 was used for the qualification of the location of sampling ports and for the determination of the number and positions of stack traverse points, as applicable to sample traverses for Method 2.
- EPA Method 2 was employed for the determination of the stack gas velocity and volumetric flow rate during stack sampling using the Type "S" Pitot tube.
- EPA Method 3A was used for the calculation of the density and dry molecular weight of the effluent stack gas as well as to determine the oxygen and carbon dioxide concentrations using a calibrated instrumental analyzer.
- EPA Method 4 was used for the determination of moisture content.
- EPA Method 5 was used for the determination of total filterable particulate matter.
- EPA Method 10 was used for the determination of carbon monoxide emission concentrations.
- EPA Method 19 was to determine the heat input of the boiler and was used to report the applicable emissions in the units of lbs/MMBtu.
- EPA Method 26A was used for the determination of hydrogen chloride emissions.
- EPA Method 30B was used for the determination of total vapor phase mercury emissions.

All samples were stored upright in a closed sample box until final laboratory analysis. In order to limit the chain of custody, only essential *AIR* personnel are permitted access to these samples.

5.0 QUALITY ASSURANCE ACTIVITIES

The quality assurance/quality control (QA/QC) measures associated with the sampling and analysis procedures given in the noted EPA reference methodologies, in Subparts A of 40 *CFR* 60 and 40 *CFR* 63, and in the *EPA QA/QC Handbook*, Volume III (EPA 600/R-94/038c) were employed, as applicable. Such measures included, but were not limited to, the procedures detailed below.

5.1 PROBE NOZZLE DIAMETER CHECKS

Probe nozzles were calibrated before field testing by measuring the internal diameter of the nozzle entrance orifice along three different diameters. Each diameter was measured to the nearest 0.001 inch, and all measurements were averaged. The diameters were within the limit of acceptable variation of 0.004”.

5.2 PITOT TUBE FACE PLANE ALIGNMENT CHECK

Before field testing, each Type S Pitot tube was examined in order to verify that the face planes of the tube were properly aligned, per Method 2 of 40 *CFR* 60, Appendix A. The external tubing diameter and base-to-face plane distances were measured in order to verify the use of 0.84 as the baseline (isolated) Pitot coefficient. At that time the entire probe assembly (i.e., the sampling probe, nozzle, thermocouple, and Pitot tube) was inspected in order to verify that its components met the interference-free alignment specifications given in EPA Method 2. Because the specifications were met, then the baseline Pitot coefficient was used for the entire probe assembly.

After field testing, the face plane alignment of each Pitot tube was checked. No damage to the tube orifices was noted.

5.3 METERING SYSTEM CALIBRATION

Every three months each dry gas meter (DGM) console is calibrated at five orifice settings according to Method 5 of 40 *CFR* 60, Appendix A. From the calibration data, calculations of the values of Y_m and $\Delta H_{@}$ are made, and an average of each set of values

is obtained. The limit of total variation of Y_m values is ± 0.02 , and the limit for $\Delta H_{@}$ values is ± 0.20 .

After field testing, the calibration of the DGM console was checked by performing three calibration runs at a single intermediate orifice setting that is representative of the range used during field-testing. Each DGM was within the limit of acceptable relative variation from Y_m of 5.0%.

5.4 TEMPERATURE GAUGE CALIBRATION

After field testing, the temperature measuring instruments on each sampling train was calibrated against standardized mercury-in-glass reference thermometers. Each indicated temperature was within the limit of acceptable variation between the absolute reference temperature and the absolute indicated temperature of 1.5%.

5.5 GAS ANALYZER CALIBRATION

5.5.1 CALIBRATION GAS CONCENTRATION VERIFICATION

AIR obtained a certificate from the gas manufacturer and confirmed that the documentation included all information required by the Environmental Protection Agency Traceability Protocol No. 1. AIR confirmed that the manufacturer certification was complete and current and that calibration gases certifications had not expired. This documentation was available on-site for inspection during testing and is presented in Appendix E.

5.5.2 MEASUREMENT SYSTEM PREPARATION

AIR assembled, prepared, and preconditioned each measurement system by following the manufacturer's written instructions for preparing and preconditioning each gas analyzer and, as applicable, the other system components. AIR made all necessary adjustments to calibrate the analyzers and the data recorders and to achieve the correct sampling rate.

5.5.3 ANALYZER CALIBRATION ERROR

After sampling system and analyzer assembly, preparation and calibration, AIR conducted a 3-point analyzer calibration error test before the first run. AIR introduced the low-, mid-, and high-level calibration gases sequentially in direct calibration mode. During the test, AIR made no adjustments to the system except to maintain the correct flow rate. AIR recorded the analyzer's response to each calibration gas and calculated the system calibration error. At each calibration gas level (low, mid, and high) the calibration error was within ± 2.0 percent or 0.5 ppm of the calibration span.

5.5.4 INITIAL SYSTEM BIAS AND CALIBRATION ERROR CHECKS

Before sampling began, AIR determined that the high-level calibration gas best approximated the emissions and used it as the upscale gas. AIR introduced the upscale gas at the probe upstream of all sample conditioning components in system calibration mode. The time it took for the measured concentration to increase to a value that is within 95 percent of the certified gas concentration was recorded. AIR continued to observe the gas concentration reading until it reached a final, stable value and recorded the value.

Next, AIR introduced the low-level gas in system calibration mode and recorded the time required for the concentration response to decrease to a value that was within 5.0 percent of the certified low-range gas concentration.

AIR continued to observe the low-level gas reading until it reached a final, stable value and recorded the result. AIR operated the measurement system at the normal sampling rate during all system bias checks and made only the adjustments necessary to achieve proper calibration gas flow rates at the analyzer. From this data, AIR determined the initial system bias was less than 5% of the calibration span for the low- and high- level gases.

5.5.5 MEASUREMENT SYSTEM RESPONSE TIME

AIR calculated the measurement system response time from the data collected during the Initial System Bias Check.

5.6 INSTRUMENT INTERFERENCE RESPONSE

AIR obtained instrument vendor data that demonstrates the interference performance specification is not exceeded as defined in EPA Method 7E Section 13.4. Documentation is provided in Appendix D.

5.7 DATA REDUCTION CHECKS

AIR ran an independent check (using a validated computer program) of the calculations with predetermined data before the field test, and the *AIR* Team Leader conducted spot checks on-site to assure that data was being recorded accurately. After the test, *AIR* checked the data input to assure that the raw data had been transferred to the computer accurately.

5.8 EXTERNAL QUALITY ASSURANCE

5.8.1 TEST PROTOCOL EVALUATION

A Site-Specific Test Protocol (SSTP) was submitted to MDEQ in advance of testing, which provided regulatory personnel the opportunity to review and comment upon the test and quality assurance procedures used in conducting this testing.

5.8.2 ON-SITE TEST EVALUATION

A test schedule was submitted with the Site-Specific Test Protocol and MDEQ personnel were notified of all changes in the schedule. No tests were performed earlier than stated in the original schedule. Therefore, regulatory personnel were afforded the opportunity for on-site evaluation of all test procedures.

6.0 DATA QUALITY OBJECTIVES

The data quality objectives (DQOs) process is generally a seven-step iterative planning approach to ensure development of sampling designs for data collection activities that support decision making. The seven steps are as follows: (1) defining the problem; (2) stating decisions and alternative actions; (3) identifying inputs into the decision; (4) defining the study boundaries; (5) defining statistical parameters, specifying action levels, and developing action logic; (6) specifying acceptable error limits; and (7) selecting resource-effective sampling and analysis plan to meet the performance criteria. The first five steps are primarily focused on identifying qualitative criteria such as the type of data needed and defining how the data will be used. The sixth step defines quantitative criteria and the seventh step is used to develop a data collection design. In regards to emissions sampling, these steps have already been identified for typical monitoring parameters.

Monitoring methods presented in 40 *CFR* 60 Appendix A indicate the following regarding DQOs: Adherence to the requirements of this method will enhance the quality of the data obtained from air pollutant sampling methods. At a minimum, each method provides the following types of information: summary of method; equipment and supplies; reagents and standards; sample collection, preservation, storage, and transportation; quality control; calibration and standardization; analytical procedures, data analysis and calculations; and alternative procedures. These test methods have been designed and tested according to DQOs for emissions testing and analysis. These test methods have been specified and were followed in accordance with the Site-Specific Test Protocol submitted to MDNRE to ensure that DQOs were met for this project.

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