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1. PROJECT OVERVIEW

TEST PROGRAM SUMMARY

EES Coke Battery, LLC contracted CleanAir Engineering (CleanAir) to complete compliance testing on the Underfire Combustion Stack at the Zug Island facility located in River Rouge, Michigan.

The test program objective was to perform total particulate matter (TPM), non-sulfate filterable particulate matter (NSFPM), and volatile organic compound (VOC) testing to demonstrate compliance with Michigan Permit to Install (MI-PTI) No. 51-08C. Emissions were sampled while the process operated at ≥ 90% operating capacity.

A summary of the test program results is presented below. Section 2 Results provides a more detailed account of the test conditions and data analysis.

Table 1-1: Summary of Results / Permit Limits

Source	Source Average							
Constituent	Sampling Method	Emission	Permit Limit ¹					
Underfire Combustion Stack								
NSFPM (lb/hr)	EPA 5F (Modified)	2.1	25.7					
NSFPM (gr/dscf)	EPA 5F (Modified)	0.0018	0.012					
FPM (lb/1000 lb exhaust gas @50% EA)	EPA5	0.031	0.095					
TPM, as PM₁₀ (lb/hr)	EPA 5/202	30.0	73.3					
TPM, as PM _{2.5} (lb/hr)	EPA 5/202	30.0	73.0					
VOC (lb/hr)	EPA 25A	30.6	43.1					
VOC (lb/MMBtu, heat input)	EPA 25A	0.0589	0.0956					

¹Permit limits obtained from MI-PTI No. 51-08C.

TEST PROGRAM DETAILS

PARAMETERS

The test program included the following measurements:

- total particulate matter (TPM), filterable and condensable particulate matter (FPM and CPM), reported as:
 - particulate matter less than 10 microns in diameter (PM₁₀)
 - particulate matter less than 2.5 microns in diameter (PM_{2.5})
- non-sulfate filterable particulate matter (NSFPM)
- volatile organic compounds (VOC), measured as non-methane hydrocarbons (NMHC)
- flue gas composition (e.g., O₂, CO₂, H₂O)
- flue gas temperature
- flue gas flow rate

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SCHEDULE

Testing was performed on September 14 and 15, 2021. Table 1-2 outlines the on-site schedule followed during the test program.

Table 1-2: Test Schedule

Run Number ¹	Location	Method	Analyte	Date	Start Time	End Time
Italiibei	Location	metriou	Allalyte	Date	THITC	11110
1	Underfire Combustion Stack	USEPA Method 5F	Nonsulfate FPM	09/14/21	08:55	11:18
2	Underfire Combustion Stack	USEPA Method 5F	Nonsulfate FPM	09/14/21	12:20	15:25
3	Underfire Combustion Stack	USEPA Method 5F	Nonsulfate FPM	09/14/21	16:11	18:30
4	Underfire Combustion Stack	USEPA Method 5F	Nonsulfate FPM	09/15/21	08:22	10:43
1	Underfire Combustion Stack	USEPA Method 5/202	FPMCPM	09/14/21	08:55	11:18
2	Underfire Combustion Stack	USEPA Method 5/202	FPM/CPM	09/14/21	12:20	15:25
3	Underfire Combustion Stack	USEPA Method 5/202	FPMCPM	09/14/21	16:11	18:30
1	Underfire Combustion Stack	USEPA Methods 3A, 25A	O ₂ /CO ₂ , VOC	09/14/21	09:37	10:37
2	Underfire Combustion Stack	USEPA Methods 3A, 25A	O ₂ /CO ₂ , VOC	09/14/21	12:28	13:28
3	Underfire Combustion Stack	USEPA Methods 3A, 25A	O ₂ /CO ₂ , VOC	09/14/21	13:47	14:47

¹ Run 1 was invalidated due to a failed post-test leak check and not included in any averages.

DISCUSSION

Test Program Details

A failed final leak check during USEPA Method 5F Run 1 caused CleanAir to perform a fourth run the following morning. Oxygen readings on the meter console were steady during the entire run and the final moisture content closely agreed with Runs 2 through 4. It is possible that something occurred during the removal of the probe from the stack at the conclusion of Run 1, such as a line coming loose. To err on the side of caution, both CleanAir and EGLE representatives agreed to perform a fourth run. Run 1 is not included in any results averages.

PM₁₀/PM_{2.5}

Appendix A of MI-PTI No. 51-08C states that testing for PM $_{10}$ and PM $_{2.5}$ follow EPA Methods 201A and 202. The test duration is listed as 120 minutes, with a minimum sample volume requirement of 60 dscf, respectively. The appendix states that any changes to the test methodology must be approved by the EGLE Air Quality Division (AQD) District Supervisor.

Modifications to PM₁₀/PM_{2.5} Testing

The test ports at the sample location are not an adequate size to accommodate the Method 201A $PM_{10}/PM_{2.5}$ cyclone head. Numerous issues with broken glass due to the narrow and long test ports occurred during the 2015 test campaign. CleanAir used EPA Method 5 in lieu of Method 201A.

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CleanAir has performed a results comparison between Method 201A/202 versus Method 5/202. Test data from the 2015 compliance program highlight a similarity between the readings with the Method 5/202 results being biased slightly higher than the Method 201A/202 results. For example, the three-run average (gr/dscf) of TPM for Methods 201A/202 and 5/202 were 0.0466 and 0.0484, respectively. The Method 5/202 results were approximately 3.7% higher than the 201A/202 results.

TPM is defined as the sum of filterable and condensable particulate matter. Method 5/202 does not provide unique values for PM₁₀ and PM_{2.5} and TPM was instead used to determine PM₁₀ and PM_{2.5} emissions. The use of Method 5 rather than Method 201A was approved during the 2017, 2019, and 2021 test programs.

In addition, this location experiences high winds that increase the likelihood of broken glassware during port changes. CleanAir requested approval to use stainless steel-lined probes and nozzles in lieu of borosilicate glass or quartz liners during the 2019 compliance campaign. This was approved during the 2017, 2019, and 2021 test program.

An excerpt from Section 6.1.1.2 of EPA Method 5 reads:

"Alternatively, metal liners (e.g., 316 stainless steel, Incoloy 825 or other corrosion resistant metals) made of seamless tubing may be used, subject to the approval of the Administrator."

NSFPM

Appendix A of MI-PTI No. 51-08C states that requirements for particulate matter determinations (excluding sulfates) must be conducted per EPA Method 5, corrected for sulfate. The permit also requires a sample time of 60 minutes, with a minimum sample volume of 30 dscf. Any changes to the testing methods must be approved by the AQD District Supervisor.

Invalidated Test Run

EPA Method 5F Run 1 failed the final leak check resulting in CleanAir invalidating the test and collecting a total of four samples. The leak was found to have occurred at the back half of the particulate filter on a Teflon line connection (outside of the stack). Upon further analysis of the results, CleanAir believes this leak occurred when the probe was being removed from the final test port and prior to conducting the last leak check.

Run 1 moisture content was 14.79% while the 3-run average of Runs 2 through 4 averaged 14.72%. If a leak outside of the stack would have occurred during any test, the moisture content of ambient air would have driven down the moisture content to as low as 11.5% if this leak occurred during the final port change to impact the final 15-minutes of testing.

Modifications to NSFPM Testing

CleanAir sampled particulate matter isokinetically and collected on a filter maintained at a temperature in the range of 320 ±25°F, with a minimum of 60 dscf of sample gas collected over a 120-minute test period for each run. The modification was followed during compliance testing in 2015, 2017, 2019, and 2021 based on the conversation documented below.

A conference call between EES, EGLE, and CleanAir representatives was held on Monday, January 26, 2015, to discuss the best methodology for the determination of sulfate free particulate emissions at the Underfire Combustion Stack. It was agreed upon to perform EPA Method 5F for the sulfate-free filterable particulate matter measurements. This method is contained in Appendix A of 40 CFR 60.

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Concern was raised by EGLE that the recovery of the probe with a water rinse would not be adequate and requested a change to acetone. The following deviations to the method were agreed upon during the conference call and were performed on-site:

- 1. The sample train nozzle, probe liner, and front-half filter holder were rinsed and recovered with acetone (Method 5F outlines the use of deionized distilled water; ASTM D1193–77 or 91 Type 3).
- 2. Due to the use of acetone, additional analytical steps were taken by the CleanAir Analytical laboratory, located in Palatine Illinois, during the first analytical step:
 - a. The acetone was evaporated in a tared FEP beaker liner while the filter was digested.
 - b. The acetone residue was combined with the filter digestate and brought to volume in a 500 mL flask.
 - c. The flask was settled, and an aliquot was removed for sulfate determinations.
 - d. The solution was re-evaporated in the original tared FEP beaker liner and the normal analytical steps, as outlined in Method 5F, were followed.

In addition, CleanAir requested approval to use stainless steel-lined probes and nozzles in lieu of borosilicate glass or quartz liners during the 2019 compliance campaign as mentioned in the $PM_{10}/PM_{2.5}$ discussion above. This was approved during the 2017, 2019, and 2021 test program.

VOC

VOC emission rates from the Underfire Combustion Stack were measured following EPA Method 25A. A total of three 60-minute tests were performed at a single point following a stratification check performed during Run 1. Results of the stratification check are in Appendix D. VOC results were reported on a propane-basis.

CleanAir directly measured the NMHC using a Thermo Model 55i Non-Methane Hydrocarbon Analyzer. The 55i analyzer utilizes a back-flush GC/FID system to cut the methane (GC) and measure non-methane hydrocarbons (FID) directly. It has lower detection limits of 20 ppb methane and 50 ppb NMHC. The proprietary column design is unaffected by the oxygen content of the sample and provides complete recovery of low volatility compounds while achieving absolute separation of methane from all carbon (C_2) compounds. Each measurement cycle takes approximately 70 seconds.

The NMHC measurement is reported as VOC. The NMHC measurements were made on a wet volumetric basis and corrected to a dry basis using concurrent flue gas moisture measurements. Mass emission rates were calculated using the heat value of the fuel in conjunction with relative EPA Method 19 calculations.

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EGLE Site Feedback

Following the completion of testing, but prior to departing the facility, CleanAir received feedback from EGLE regarding low flow rates and future implementation of a micro manometer for flow rate determinations. The arithmetic average of all ΔP readings for each test was 0.05 or greater. While a micro manometer was not available on this project or discussed until its conclusion, CleanAir re-analyzed the raw data to replace all sub-0.05 readings with 0.05. Below are notes of the results:

- % Isokinetics go from 104.2% to 100.7%
- FPM (lb/1,000 lb Exhaust Gas @ 50% EA) & NSFPM (gr/dscf) remain unchanged
- Volumetric flow rate (dscfm) increases by 3.4%
- TPM as PM₁₀/PM_{2.5} (lb/hr) & NSFPM (lb/hr) increase by 3.4%
 - o EPA Method 5/202 TPM as PM₁₀/PM_{2.5} average of 31.0 lb/hr vs. permit limit of 73 lb/hr
 - EPA Method 5F NSFPM average of 2.15 lb/hr vs. permit limit of 25.7 lb/hr

While the re-analysis does not have a significant impact on the results, the best approach is to implement a micro manometer on future projects at the Underfire Combustion Stack due to provide increased flow rate sensitivity and measurements. This will be included in the 2023 test program.

End of Section

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This section summarizes the test program results. Additional results are available in the report appendices.

Underfire Combustion Stack - NSFPM, Method 5F (Modified)

Run No).	2	3	4	Average
Date (2	021)	Sep 14	Sep 14	Sep 15	
Start Ti	me (approx.)	12:20	16:11	08:22	
Stop Ti	me (approx.)	15:25	18:30	10:43	
Proces	s Conditions				
P_1	No. of ovens charged per run	14	11	10	
P_2	Coal charged (dry tons/run)	447	350	319	372
P_3	COG used for Underfire combustion (kscf/run)	2,948	2,265	2,219	2,477
Сар	Capacity factor (hours/year)	8,760	8,760	8,760	8,760
Gas Co	onditions				
O_2	Oxygen (dry volume %)	10.5	10.3	10.4	10.4
CO_2	Carbon dioxide (dry volume %)	5.3	5.4	5.3	5.4
T_s	Stack temperature (°F)	515	514	511	513
B_w	Actual water vapor in gas (% by volume)	14.6	15.1	14.5	14.7
Gas Flo	ow Rate				
Q_a	Volumetric flow rate, actual (acfm)	296,000	290,000	285,000	290,000
Q_s	Volumetric flow rate, standard (scfm)	156,000	153,000	151,000	153,000
$\mathbf{Q}_{\mathrm{std}}$	Volumetric flow rate, dry standard (dscfm)	133,000	130,000	129,000	131,000
Sampli	ng Data				
V_{mstd}	Volume metered, standard (dscf)	79.01	77.77	76.28	77.68
%1	Isokinetic sampling (%)	104.3	105.4	103.9	104.5
Labora	tory Data				
m_n	Total NSFPM (g)	0.01428	0.00649	0.00720	
NSFPM	Results				
$C_{\sf sd}$	Particulate Concentration (lb/dscf)	3.99E-07	1.84E-07	2.08E-07	2.64E-07
C_{sd}	Particulate Concentration (gr/dscf)	2.79E-03	1.29E-03	1.46E-03	1.84E-03
E _{lb/hr}	Particulate Rate (lb/hr)	3.19	1.43	1.61	2.08
E _{T/yr}	Particulate Rate (Ton/yr)	14.0	6.28	7.06	9.10

Average includes 3 runs.

¹ Run 1 was invalidated due to a failed post-test leak check.

Table 2-2: Underfire Combustion Stack – TPM, Method 5/202

Run No.		1	2	3	Average
Date (20	21)	Sep 14	Sep 14	Sep 14	
Start Tim	e (approx.)	08:55	12:20	16:11	
Stop Tim	e (approx.)	11:18	15:25	18:30	
Process	Conditions				
R_P	Excess Air (%)	84	90	86	87
P ₁	No. of ovens charged per run	10	14	11	
P ₂	Coal charged (dry tons/run)	313	447	350	370
P_3	COG used for Underfire combustion (kscf/run)	2,281	2,948	2,265	2,498
Cap	Capacity factor (hours/year)	8,760	8,760	8,760	8,760
Gas Con	ditions				
O ₂	Oxygen (dry volume %)	10.2	10.5	10.3	10.3
CO ₂	Carbon dioxide (dry volume %)	5.5	5.3	5.4	5.4
T _s	Stack temperature (°F)	511	513	518	514
B _w	Actual water vapor in gas (% by volume)	15.8	14.8	15.5	15.4
Gas Flow	, Rate				
Q _a	Volumetric flow rate, actual (acfm)	292,000	308,000	289,000	296,000
Q_s	Volumetric flow rate, standard (scfm)	155,000	163,000	152,000	156,000
Q_{std}	Volumetric flow rate, dry standard (dscfm)	130,000	138,000	129,000	132,000
Samplin	n Data				
V _{mstd}	Volume metered, standard (dscf)	78.10	81.03	75.13	78.08
%1	Isokinetic sampling (%)	105.6	103.0	102.9	103.8
Laborato					
m _n	Total FPM(g)	0.07318	0.02194	0.12747	
m _{CPM}	Total CPM (g)	0.05726	0.02104	0.03570	
m _{Part}	Total particulate matter (g)	0.13044	0.10761	0.16317	
			******	*******	
	ults (Method 5) = PM	2.07E-06	5.97E-07	3.74E-06	2 425 06
C _{sd}	Particulate Concentration (lb/dscf)	0.0145	0.00418	0.0262	2.13E-06
C _{sd} ⊏	Particulate Concentration (gr/dscf) Particulate Rate (lb/hr)	16.1	4.96	28.9	0.0149 16.6
E _{lb/hr}	Particulate Rate (Ton/yr)	70.7	21.7	126	72.9
E _{T/yr} E _{EA50%}	Particulate Rate (Ib/1000 lb Exhaust Gas at 50% EA)	0.0299	0.00898	0.0548	0.0312
		0.0200	0.00000	0.0040	0.0012
	sults (Method 202)	4.005.00	0.005.00	4.055.00	4 075 00
C _{sd}	Particulate Concentration (lb/dscf)	1.62E-06	2.33E-06	1.05E-06	1.67E-06
C _{sd}	Particulate Concentration (gr/dscf)	0.0113	0.0163	0.00733	0.0117
E _{lb/hr}	Particulate Rate (Ib/hr)	12.6	19.4	8.08 35.4	13.4
E _{T/yr}	Particulate Rate (Ton/yr)	55.3	84.8	30.4	58.5
	rticulate Matter Results (Method 5/202) = PM ₁₀ = PM ₂₅			,	
C _{sd}	Particulate Concentration (lb/dscf)	3.68E-06	2.93E-06	4.79E-06	3.80E-06
C _{sd}	Particulate Concentration (gr/dscf)	0.0258	0.0205	0.0335	0.0266
E _{lb/h}	Particulate Rate (lb/hr)	28.8	24.3	36.9	30.0
E _{T/yr}	Particulate Rate (Ton/yr)	126	107	162	131

Average includes 3 runs.

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Table 2-3: Underfire Combustion Stack – VOC, Method 25A

Run No).	1	2	3	Average
Date (2	2021)	Sep 14	Sep 14	Sep 14	
Start Ti	me (approx.)	09:37	12:28	13:47	
Stop Ti	me (approx.)	10:37	13:28	14:47	
Proces	ss Conditions				
P_1	No. of ovens charged per run	5	5	4	
P_2	Coal charged (dry tons/run)	156	158	129	148
P_3	COG used for Underfire combustion (ksfc/run)	976	969	981	975
F_d	Oxygen-based F-factor (dscf/MMBtu)	8,020	8,020	8,020	8,020
H_{i}	Actual heat input (MMBtu/hr)	519	516	522	519
Gas Co	onditions				
O_2	Oxygen (dry volume %)	10.2	10.5	10.6	10.4
CO_2	Carbon dioxide (dry volume %)	5.5	5.4	5.3	5.4
T_s	Sample temperature (°F)	511	513	513	513
B_{w}	Actual water vapor in gas (% by volume)	15.8	14.8	14.8	15.2
Gas Flo	ow Rate				
$\mathbf{Q}_{\mathrm{std}}$	Volumetric flow rate, dry standard (dscfm)	130,000	138,000	138,000	136,000
Volatile	e Organic Compounds (VOC), measured as NMHC	:			
	Concentration (ppmwv)	28.7	27.8	27.1	27.9
	Concentration (ppmdv)	34.0	32.7	31.8	32.8
	Mass Rate (lb/hr)	30.4	31.1	30.2	30.6
	Mass Rate (lb/MMBtu) - Heat Input	0.0586	0.0602	0.0579	0.0589

Average includes 3 runs.

Flow rate, moisture, and sample temperature data obtained from USEPAMethod 5/202 testing, Runs 1 and 2.

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3. DESCRIPTION OF INSTALLATION

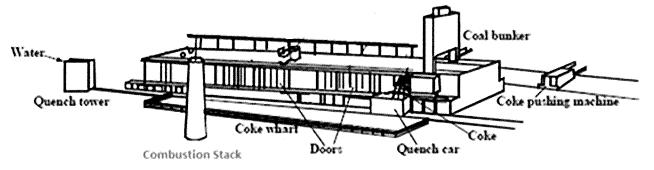
PROCESS DESCRIPTION

EES Coke Battery, LLC is a facility located on Zug Island in River Rouge, Michigan. The testing described in this document was performed at the Combustion Stack.

The No. 5 Coke Battery consists of 85 six-meter-high ovens producing furnace coke. A coal blend is used to charge each oven on timed intervals depending on the current production of the battery. Coking of the coal occurs in an oxygen free environment for 17 to 30 hours and the gases produced are collected, cleaned, and used to under fire the battery, supply fuel for other site sources, and sold to permitted off-site utilities.

The current permit limits allow for the charging of up to 1.420 million dry tons of coal. The design capacity heating requirement of the battery is approximately 375 MMBtu per hour. Also, the heating requirements of the battery at the current production rate are approximately 325 MMBtu per hour. Process source description information above was taken directly from written information provided by EES Coke. A schematic of the process indicating sampling locations is shown in Figure 3-1.

Figure 3-1: Process Schematic



Note: The EES Coke Battery Underfire Combustion Stack is located on the other side of the battery.



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TEST LOCATION

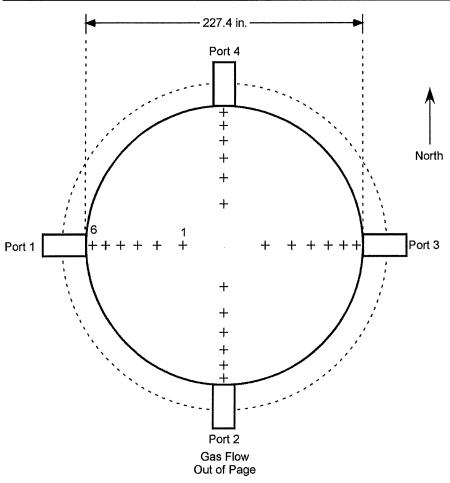
EPA Methods 1 and 7E specifications determined the sample point locations. Table 3-1 presents the sampling information for the test location. The figures shown represent the layout of the test location.

Table 3-1: Sampling Information

Source		Run		Points per	Minutes	Total	
Constituent	Method	No.	Ports	Port	per Point	Minutes	Figure
Underfire Combustion Stack							
NSFPM	EPA 5F (Modified)	1-4	4	6	5	120	3-2
TPM	EPA 5/202	1-3	4	6	5	120	3-2
VOC1	EPA 25A	1	1	3	20	60	3-3
VOC	EPA 25A	2-3	1	1	60	60	NA

¹ A stratification check was conducted during Run 1. The location was unstratified and testing for Runs 2 and 3 were conducted a single point that most closely matched the mean calculated during the stratification check.

Figure 3-2: Underfire Combustion Stack Sample Point Layout (EPA Method 1)

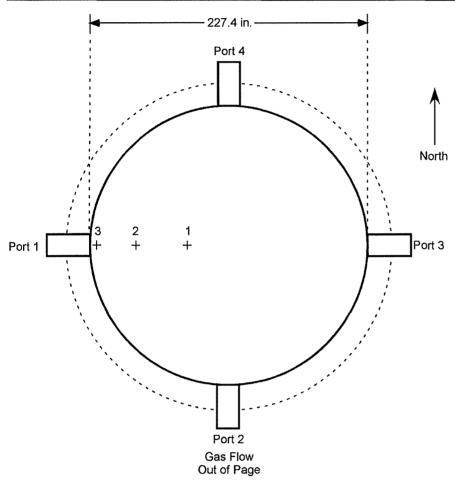


Sampling Point	% of Stack Diameter	Port to Point Distance (inches)
1	35.6	81.0
2	25.0	56.9
3	17.7	40.2
4	11.8	26.8
5	6.7	15.2
6	2.1	4.8

Duct diameters upstream from flow disturbance (A): 10.9 Limit: 0.5 Duct diameters downstream from flow disturbance (B): 2.7 Limit: 2.0

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Figure 3-3: Underfire Combustion Stack EPA Method 25A Stratification Check (EPA Method 7E)



Sampling Point	% of Stack Diameter	Port to Point Distance (inches)
1	2.0	78.7
2	1.2	47.2
3	0.4	15.7

Duct diameters upstream from flow disturbance (A): 10.9 Limit: 0.5 Duct diameters downstream from flow disturbance (B): 2.7 Limit: 2.0

Note: Stratification Check performed during Run 1.

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4. METHODOLOGY

PROCEDURES AND REGULATIONS

The test program sampling measurements followed procedures and regulations outlined by the USEPA and Michigan Department of Environment, Great Lakes and Energy (EGLE). These methods appear in detail in Title 40 of the CFR and at https://www.epa.gov/emc.

Appendix A includes diagrams of the sampling apparatus, as well as specifications for sampling, recovery, and analytical procedures. Any modifications to standard test methods are explicitly indicated in this appendix. In accordance with ASTM D7036 requirements, CleanAir included a description of any such modifications along with the full context of the objectives and requirements of the test program in the test protocol submitted prior to the measurement portion of this project. Modifications to standard methods are not covered by the ISO 17025 and TNI portions of CleanAir's A2LA accreditation.

CleanAir follows specific QA/QC procedures outlined in the individual methods and in USEPA "Quality Assurance Handbook for Air Pollution Measurement Systems: Volume III Stationary Source-Specific Methods," EPA/600/R-94/038C. Appendix D contains additional QA/QC measures, as outlined in CleanAir's internal Quality Manual.

TITLE 40 CFR PART 60, APPENDIX A

TITLE 40 CF	R PART 60, APPENDIX A
Method 1	"Sample and Velocity Traverses for Stationary Sources"
Method 2	"Determination of Stack Gas Velocity and Volumetric Flow Rate (Type S Pitot Tube)"
Method 3A	"Determination of Oxygen and Carbon Dioxide Concentrations in Emissions from Stationary Sources (Instrumental Analyzer Procedure)"
Method 4	"Determination of Moisture Content in Stack Gases"
Method 5	"Determination of Particulate Matter Emissions from Stationary Sources"
Method 5F	"Determination of Nonsulfate Particulate Matter Emissions from Stationary Sources"
Method 19	"Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide and Nitrogen Oxide Emission Rates"
Method 25A	"Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer"

TITLE 40 CFR PART 51, APPENDIX M

Method 202 "Dry Impinger Method for Determining Condensable Particulate Emissions from Stationary Sources"

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METHODOLOGY DISCUSSION

VERIFICATION OF THE ABSENCE OF CYCLONIC FLOW — EPA METHOD 1

The cyclonic flow check procedure is referred to as the "nulling" technique. An S-type pitot tube connected to an inclined manometer is used in this method. This is the same apparatus as referenced in EPA Method 2.

Note: A cyclonic flow check per EPA Method 1, Section 2.4 was completed during the compliance test program in 2015. The results of that test indicated an absence of cyclonic flow. This test was not repeated, and results are available in Appendix E of this report.

DETERMINATION OF FLUE GAS COMPOSITION — METHODS 1-4

CleanAir measured flow rates using S-type pitot tubes following sampling point requirements of EPA Methods 1 and 2. The testing occurred in four test ports at six points per port for a total of 24 points. The pitot tube measurements were used to determine the stack gas velocity and volumetric flow rate. EPA Method 3A was followed to determine the oxygen and carbon dioxide content of the flue gas. Values were obtained via continuous extraction of CleanAir CEMS or via grab samples. EPA Method 4 was followed to determine the moisture content of the sample.

The methods mentioned above were utilized to determine the flue gas volumetric flow rate and composition.

Non-sulfate Filterable Particulate Matter – Method 5F (modified)

Particulate matter was withdrawn isokinetically and collected on a quartz fiber filter maintained at a temperature of $160^{\circ}\text{C} \pm 14^{\circ}\text{C}$ ($320^{\circ}\text{F} \pm 25^{\circ}\text{F}$). A minimum of 60 dry standard cubic feet of sample gas was collected over a two-hour test period for each run. Flue gas volumetric flow rate, moisture concentration and flue gas molecular weight were also determined as part of the sample method.

Total Particulate Matter Determination – Method 5/202

The front-half (Method 5 portion) of the sampling train consisted of a stainless-steel nozzle and liner, and glass filter holder heated to 250°F, and a quartz fiber filter. Flue gas samples was extracted isokinetically, per Method 5 requirements.

Flue gas exiting the front-half heated filter passed through a coiled condenser and dry impinger system jacketed by water continually circulated at ambient temperature. Moisture was removed from the flue gas without bubbling through the condensed water. Flue gas then passed through a Teflon membrane filter at ambient temperature. The temperature of the flue gas at the exit of the filter was directly measured with an in-line thermocouple and maintained in the temperature range of 65°F to 85°F.

After exiting the ambient filter, the flue gas passed through two additional impingers surrounded by ice in a "cold" section of the impinger bucket. The moisture collected in these impingers was not analyzed for CPM and was only collected to determine the flue gas moisture and thoroughly dry the gas prior to the metering device.

The front-half portion of the sample train (nozzle, probe, and heated filter) was recovered per Method 5 requirements, using acetone as the recovery solvent. The back-half of the sample train (heated filter outlet, condenser, dry impingers and TFE membrane filter) were recovered per Method 202 requirements. The impinger train was purged with N_2 at a rate of 14 liters per minute (lpm) for one hour following each test run and prior to recovery.

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A field train blank was assembled, purged, leak checked, and recovered as if it were an actual test sample. Analysis of the field train blank was used to blank-correct the test run results. Reagent blanks were also collected to quantify background contamination. All samples and blanks were returned to CleanAir Analytical Services for gravimetric analysis. Method 202 samples were maintained at a temperature < 85°F during transport to the laboratory.

Three 120-minute Method 5/202 test runs were performed. The results are expressed as the average of three valid runs.

VOLATILE ORGANIC COMPOUNDS — METHOD 25A

Monitoring of O_2 , CO_2 , and NMHC emissions was performed using a combination of EPA Methods 3A and 25A. A gas sample was continuously extracted and delivered to a series of gas analyzers, which measured the pollutant or diluent concentrations in the gas. The analyzers were calibrated on-site using certified mixtures of EPA Protocol 1 propane calibration gases.

The system utilized a heated stainless-steel probe for gas withdrawal. The heated stainless-steel probe tip was equipped with a sintered stainless-steel filter for particulate removal. The end of the probe was connected to a heated Teflon sample line that delivered the sample gases from the stack to the CEM system. The heated sample line is designed to maintain the gas temperature above 250°F, to prevent condensation of stack gas moisture within the line.

A stratification check was performed during Run 1 as described in 40 CFR 60, Appendix A, Method 7E, §8.1.2. The stack measurement line was traversed at 2.0m, 1.2m, and 0.4m of the stack diameter to verify the absence of a stratified flue gas.

The concentration at each traverse point differed from the mean concentration for all traverse points by no more than \pm 5.0% of the mean concentration. The gas stream was considered unstratified and a single point that most closely matched the mean was used for Runs 2 and 3.

Calibration error checks were performed by introducing zero nitrogen (N_2), high range and mid-range calibration gases to the inlet of each analyzer during calibration error checks. Bias checks were performed before and after each sampling run by introducing calibration gas to the inlet of the sampling system's heated filter.

Minute-average data points for O₂, CO₂, (dry basis), and NMHC (wet basis) were collected over a period of 60 minutes for each run.

End of Section

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APPENDIX A: TEST METHOD SPECIFICATIONS

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Specification Sheet for

EPA Method 5F

Source Location Name(s)

Pollutant(s) to be Determined

Other Parameters to be Determined from Train

Underfire Combustion Stack

Non-Sulfate Filterable Particulate Matter (NSFPM)

Gas Density, Moisture, Flow Rate

Pollutant Sampling Informa	ition
----------------------------	-------

Duration of Run

No. of Sample Traverse Points

Sample Time per Point

Sampling Rate

Standard Method Specification

N/A 120 minutes

24

N/A 5 minutes

Isokinetic (90-110%) Isokinetic (90-110%)

Sampling Probe

Nozzle Material

Nozzle Design Probe Liner Material

Effective Probe Length

Probe Temperature Set-Point

Velocity Measuring Equipment

Pitot Tube Design Pitot Tube Coefficient

Pitot Tube Calibration by

Pitot Tube Attachment

Type S N/A

N/A

320°F±25°F

N/A

Geometric or Wind Tunnel

Stainless Steel or Glass

Borosilicate or Quartz Glass

Button-Hook or Elbow

Attached to Probe

Type S

0.84

Geometric

Attached to Probe

Stainless Steel

Stainless Steel

Button-Hook

320°F±25°F

12 feet

Actual Specification Used

Metering System Console

Meter Type

Meter Accuracy

Meter Resolution Meter Size

Meter Calibrated Against

Pump Type

Temperature Measurements

Temperature Resolution

ΔP Differential Pressure Gauge

ΔH Differential Pressure Gauge

Barometer

Dry Gas Meter ±2%

N/A

N/A

Wet Test Meter or Standard DGM

N/A

N/A

5.4°F

Inclined Manometer or Equivalent

Inclined Manometer or Equivalent Mercury or Aneroid

Dry Gas Meter

±1%

0.01 cubic feet

0.1 dcf/revolution

Wet Test Meter

Rotary Vane

Type K Thermocouple/Pyrometer

1.0°F

Inclined Manometer

Inclined Manometer

Digital Barometer calibrated w/Mercury Aneroid

Filter Description

Filter Location Filter Holder Material

Filter Support Material Cyclone Material

Filter Heater Set-Point Filter Material

After Probe

Borosilicate Glass

Glass Frit

N/A 320°F±25°F Glass Fiber

Exit of Probe

Borosilicate Glass

Teflon None

320°F±25°F Quartz Fiber

Other Components

Description

Location

Operating Temperature

N/A

N/A N/A N/A

N/A N/A

Specification Sheet for EPA Method 5F

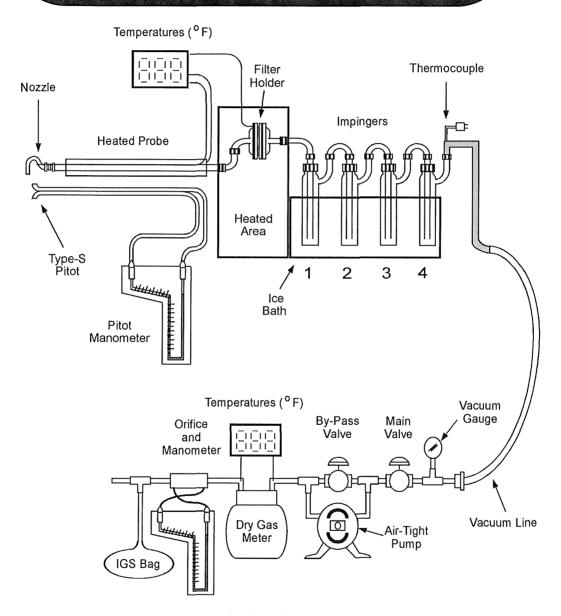
Additional Analysis

None

	Standard Method Specification	Actual Specification Used
Impinger Train Description		
Type of Glassware Connections	Ground Glass or Equivalent	Screw Joint with Silicone Gasket
Connection to Probe or Filter by	Direct Glass Connection	Direct Glass Connection
Number of Impingers	4	4
Impinger Stem Types		
Impinger 1	Modified Greenburg-Smith	Modified Greenburg-Smith
Impinger 2	Greenburg-Smith	Greenburg-Smith
Impinger 3	Modified Greenburg-Smith	Modified Greenburg-Smith
Impinger 4	Modified Greenburg-Smith	Modified Greenburg-Smith
Impinger 5		
Impinger 6		
Impinger 7		
Impinger 8		
Gas Density Determination		
Sample Collection	Multi-point integrated	Multi-Point Integrated
Sample Collection Medium	Flexible Gas Bag	Vinyl Bag
Sample Analysis	Orsat or Fyrite Analyzer	CEM
Sample Recovery Information		
Nozzle and Probe Brush Material	Nylon Bristle	Nylon Bristle
Nozzle and Probe Rinse Reagent	Deionized Distilled Water	Deionized Distilled Water
Nozzle and Probe Rinse Wash Bottle Material	Glass or Polyethylene	Polyethylene
Nozzle and Probe Rinse Storage Container	Glass or Polyethylene	Polyethylene
Filter Recovered?	Yes	Yes
Filter Storage Container	N/A	Polystyrene
Impinger Contents Recovered?	Provision	Archived
Impinger Rinse Reagent	Deionized Distilled Water	N/A
Impinger Wash Bottle	Glass or Polyethylene	N/A
Impinger Storage Container	Glass or Polyethylene	N/A
Analytical Information		
Method 4 H₂O Determination by	Gravimetric	Gravimetric
Filter Preparation Conditions	Gravimetric per Analytical Flow Chart	See Analytical Flow Chart
Front-Half Rinse Preparation	Gravimetric per Analytical Flow Chart	See Analytical Flow Chart
Back-Half Analysis	N/A	N/A

None

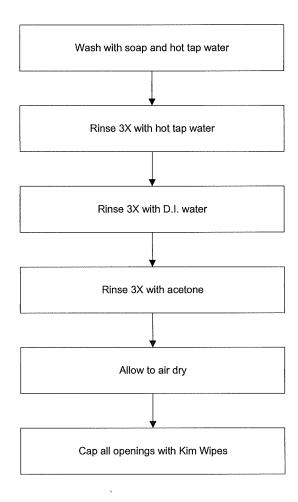
EPA Method 5F (Modified) Sampling Train Configuration



Impinger Contents

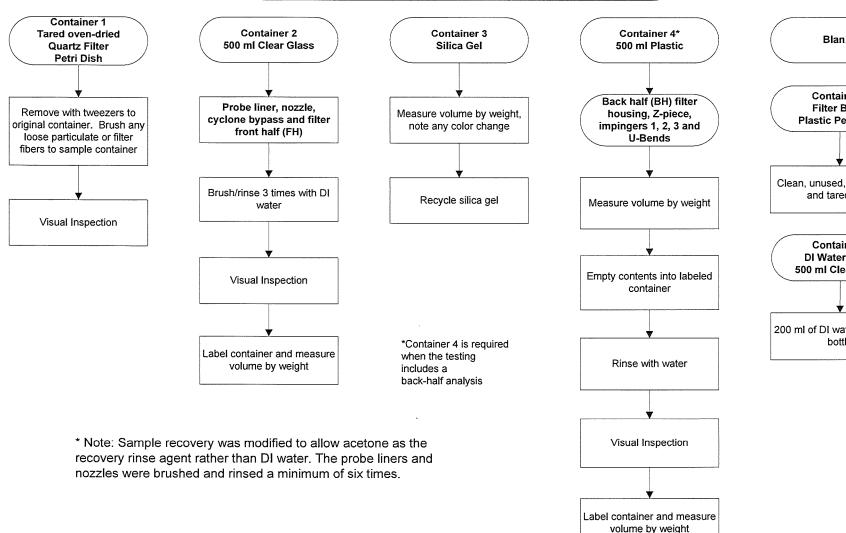
<u>impinger Contents</u>		
DI H₂O		
DI H₂O		
Empty		
Silica gel		

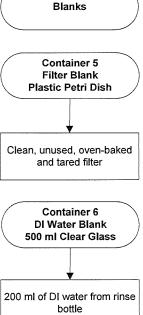
EPA Method 5F Glassware Preparation Procedures



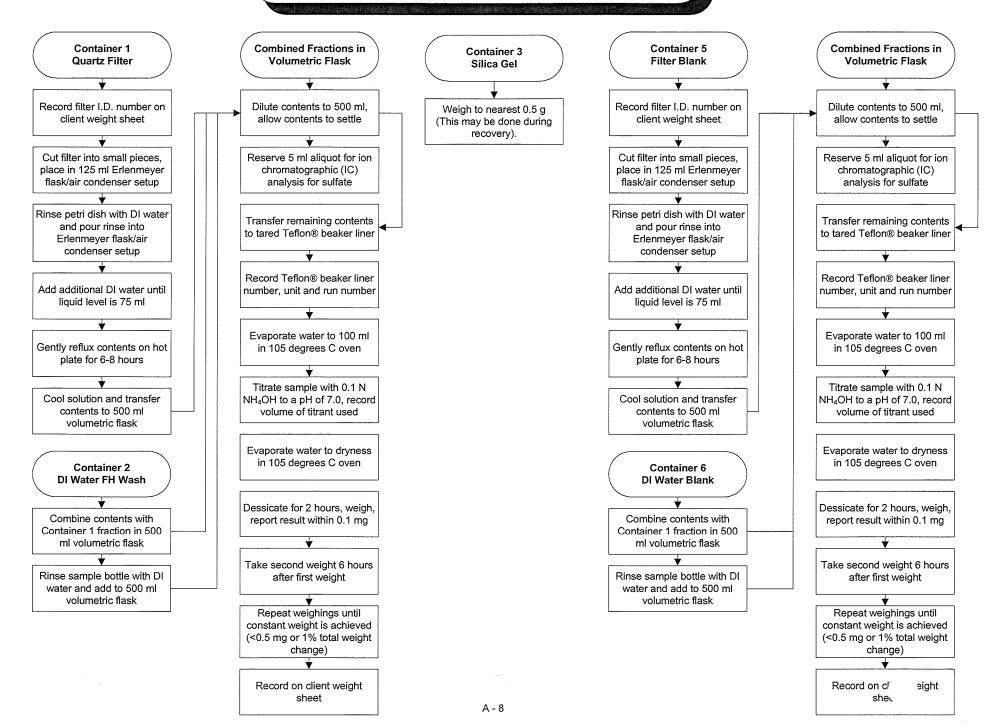
EPA Method of (Modified) Sample Recovery Flowchart

- Tare all sample containers before sample collection
- Mark all liquid levels and final weights on the outside of each sample container
- Seal all sample containers with Teflon tape
- If recycling, bake silica gel for two hours at 350 degrees F (175 degrees C)





EPA Method 5F Analytical Flowchart



EPA Method 5/202

Source Location Name(s)

Underfire Combustion Stack

Pollutant(s) to be Determined

Filterable Particulate Matter (FPM) and Condensable Particulate Matter (CPM)

Other Parameters to be Determined from Train

Gas Density, Moisture, Flow Rate **Standard Method Specification**

Pollutant Sampling Information

N/A 120 minutes

Duration of Run No. of Sample Traverse Points

N/A

Sample Time per Point

N/A

5 minutes

24

Sampling Rate

Isokinetic (90-110%)

Isokinetic (90-110%)

Actual Specification Used

Sampling Probe

Nozzle Material Nozzle Design Probe Liner Material

Stainless Steel or Glass Button-Hook or Elbow Glass or Teflon

Stainless Steel Button-Hook

Effective Probe Length Probe Temperature Set-Point N/A

Stainless Steel 12 feet

248°F±25°F

248°F±25°F

Velocity Measuring Equipment

Pitot Tube Design Pitot Tube Coefficient Pitot Tube Calibration by

Pitot Tube Attachment

Type S N/A

Type S 0.84

Geometric or Wind Tunnel

Geometric

Attached to Probe

Attached to Probe

Metering System Console

Meter Type Meter Accuracy

Meter Resolution Meter Size

Meter Calibrated Against

Pump Type Temperature Measurements

Temperature Resolution

ΔP Differential Pressure Gauge ΔH Differential Pressure Gauge

Barometer

Dry Gas Meter

±2%

N/A

N/A Wet Test Meter or Standard DGM

N/A

N/A

5.4°F

Inclined Manometer or Equivalent Inclined Manometer or Equivalent

Mercury or Aneroid

Dry Gas Meter

±1%

0.01 cubic feet 0.1 dcf/revolution

Wet Test Meter Rotary Vane

Type K Thermocouple/Pyrometer

1.0°F

Inclined Manometer

Inclined Manometer

Digital Barometer calibrated w/Mercury Aneroid

FPM Filter Description

Filter Location Filter Holder Material Filter Support Material

Cyclone Material Filter Heater Set-Point Filter Material

After Probe

Quartz Glass Frit N/A 248°F±25°F Exit of Probe

Borosilicate Glass Teflon

None 248°F±25°F Quartz Fiber

Other Components

Description

Location Operating Temperature Condenser

Glass Fiber

Before Impinger 1 ≤85°F

Condenser

Before 1st Impinger

≤85°F

EPA Method 5/202

Impinger Train Descripti	ion	otic	rip	sc	Des	Train	er:	nae	lmg
--------------------------	-----	------	-----	----	-----	-------	-----	-----	-----

Type of Glassware Connections Connection to Probe or Filter by

Number of Impingers Impinger Stem Types

Impinger 1 Impinger 2 Impinger 3

Impinger 4 Impinger 5

Impinger 6 Impinger 7 Impinger 8 Standard Method Specification

Leak-Free Glass Connectors So

Direct or Flexible Connection

4

Screw Joint with Silicone Gasket

Direct Glass Connection

Actual Specification Used

Δ

Shortened Stem (open tip)

Modified Greenburg-Smith

Modified Greenburg-Smith

Modified Greenburg-Smith

Modified Greenburg-Smith

Modified Greenburg-Smith

Modified Greenburg-Smith

CPM Filter Description

Filter Location

Filter Holder Material

Filter Support Material Cyclone Material

Filter Heater Set-Point Filter Material

Gas Density Determination

Sample Collection
Sample Collection Medium

oampic concentri wediai

Sample Analysis

Multi-point integrated

Teflon

None

>65°F but ≤85°F

Teflon Membrane

Flexible Gas Bag Orsat or CEM Analyzer

Between 2nd and 3rd Impingers

Glass, Stainless Steel or Teflon

Between 2nd and 3rd Impingers

Borosilicate Glass

Teflon None

>65°F but ≤85°F Teflon Membrane

Sample Recovery Information

Nozzle Brush Material Nozzle Rinse Reagent

Nozzle Rinse Wash Bottle Material Nozzle Rinse Storage Container

Filter Recovered?

Filter Storage Container

Impinger Contents Recovered?

Impinger Rinse Reagent
Impinger Wash Bottle

Impinger Storage Container

Nylon Bristle or Teflon

Acetone

Glass or Polyethylene

Glass or Polyethylene

Yes

FH filter in petri dish, CPM filter in petri dish

Yes

DI Water/Acetone/Hexane

Inorganic in polyethylene, organic in Teflon Inorganic in polyethylene, organic in glass

Multi-Point Integrated

Vinyl Bag CEM

Nylon Bristle

Acetone
Inorganic in polyethylene, organic in Teflon

Glass

FH filter in petri dish, CPM filter in petri dish

Yes

DI Water/Acetone/Hexane

Inorganic in polyethylene, organic in Teflon Inorganic in amber glass, organic in amber glass

Analytical Information

Method 4 H₂O Determination by Filter Preparation Conditions

Front-Half Rinse Preparation

Back-Half Analysis Additional Analysis Gravimetric

Dessicate 24 Hours or Filter Extraction

Evaporate at ambient temperature and pressure

Sonication and Extraction

N/A

Gravimetric

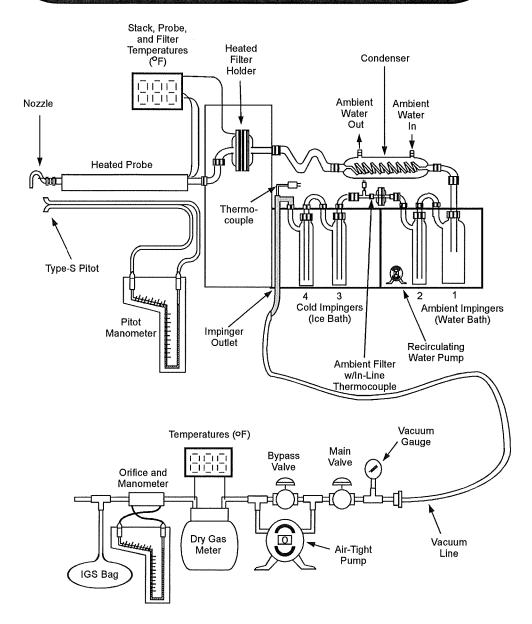
See Analytical Flow Chart

Evaporate at ambient temperature and pressure

See Analytical Flow Chart

None

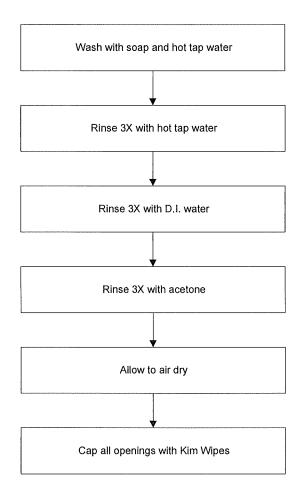
EPA Method 5/202 Sampling Train Configuration



Impinger Contents

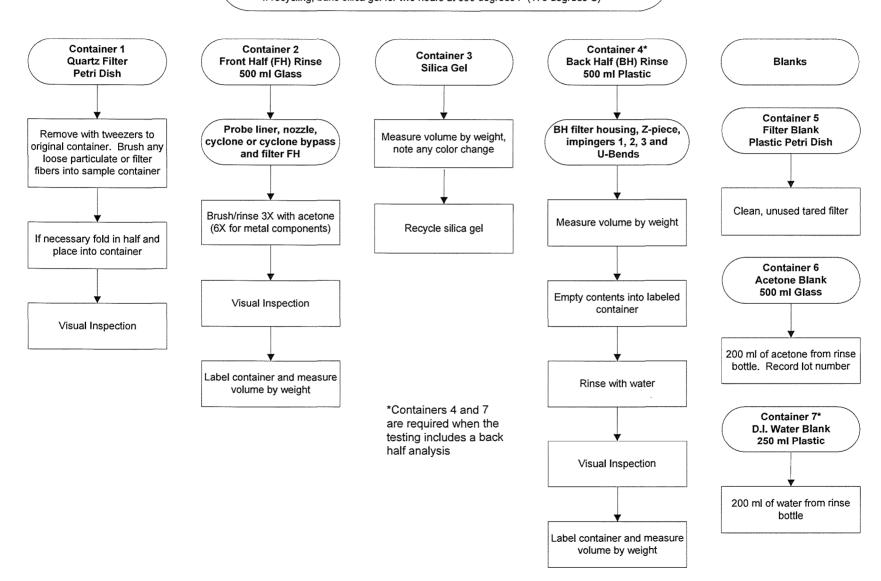
impinger contente				
Impinger 1	Empty			
Impinger 2	Empty			
Impinger 3	DI H₂O			
Impinger 4	Silica Gel			

EPA Method 5 Glassware Preparation Procedures



EPA Method 5 Sample Recovery Flowchart

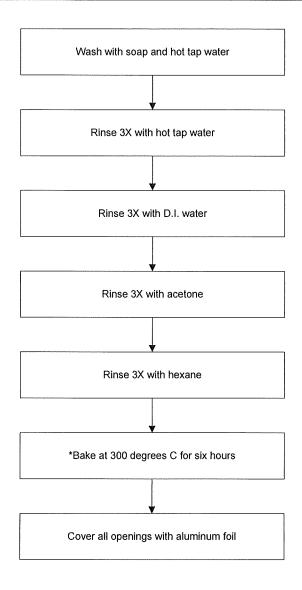
- Tare all sample containers before sample collection
- Mark all liquid levels and final weights on the outside of each sample container
- Seal all sample containers with Teflon tape
- If recycling, bake silica gel for two hours at 350 degrees F (175 degrees C)



EPA Method 5 Analytical Flowchart



EPA Method 202 Glassware Preparation Procedures



Before each run, rinse the train glassware with deionized, distilled, ultra-filtered water containing 1 ppmwv residual mass or less.

^{*}As an alternative to baking glassware, a field train proof blank can be performed on the sampling train glassware.

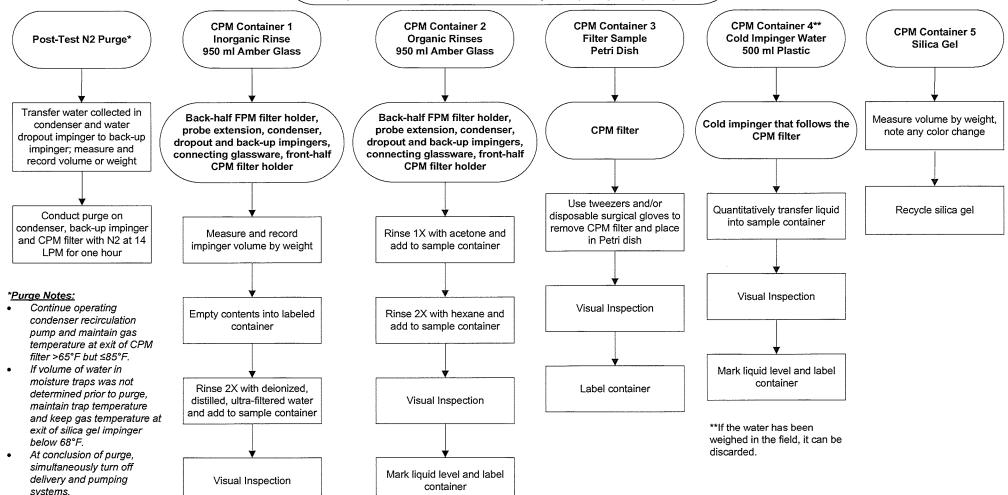
EPA Method 202 Sample Recovery Flowchart (1 of 2)

- Tare all sample containers before sample collection
- Mark all liquid levels and final weights on the outside of each sample container
- Seal all sample containers with Teflon tape

For high moisture sampling, weigh and change out silica gel prior to purging.

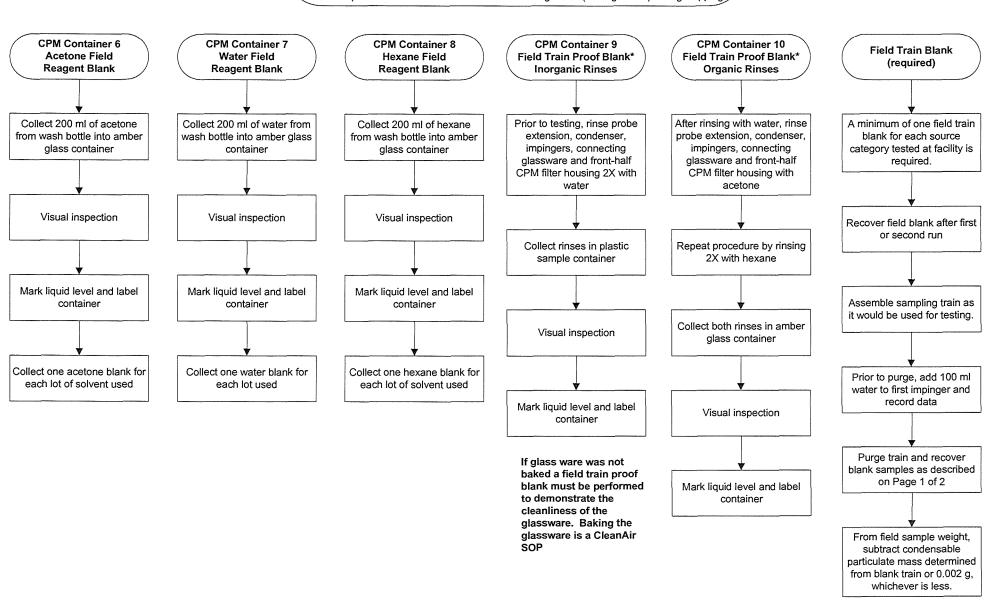
Mark liquid level and label container

- If recycling, bake silica gel for two hours at 350 degrees F (175 degreesC)
 - Samples must be maintained at or below 85 degrees F (30 degrees C) during shipping,

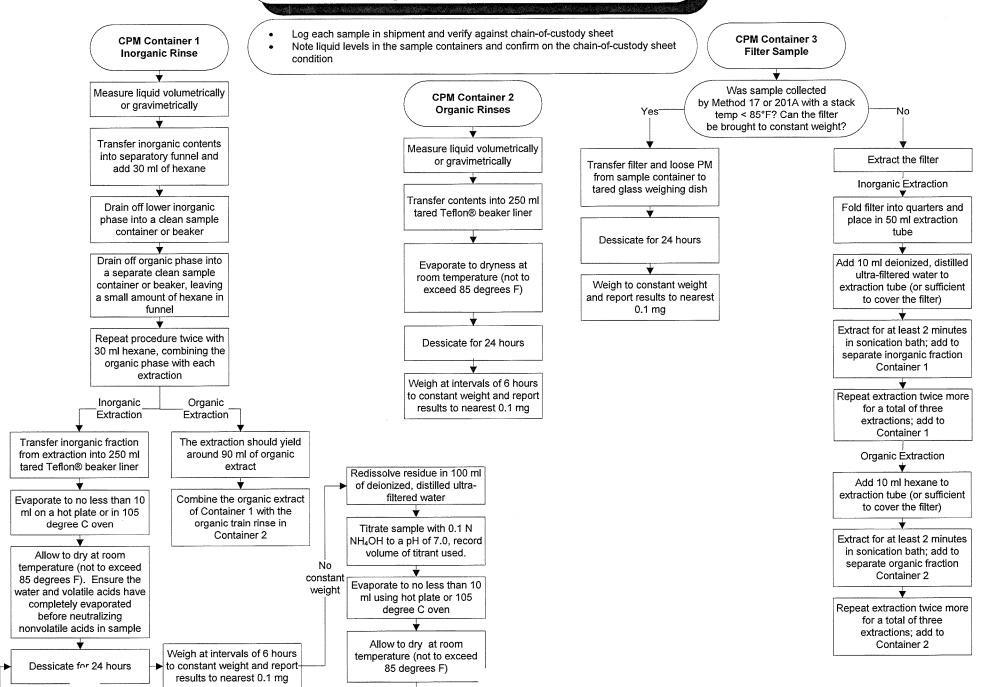


EPA thod 202 Sample Recovery Flowchart (2 of 2)

- Tare all sample containers before sample collection
- · Mark all liquid levels and final weights on the outside of each sample container
- Seal all sample containers with Teflon tape
- If recycling, bake silica gel for two hours at 350 degrees F (175 degrees C)
- Samples must be maintained at or below 85 degrees F (30 degrees C) during shipping.



EPA Method 202 Analytical Flowchart (1 of 2)



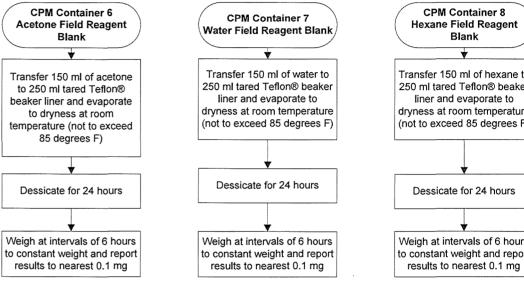
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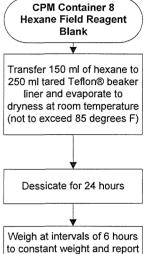
EPA Mes. od 202 Analytical Flowchart (2 of 2)

- Log each sample in shipment and verify against chain-of-custody sheet
- Note liquid levels in the sample containers and confirm on the chain-of-custody sheet

CPM Container 4* CPM Container 5* **Cold Impinger Water** Silica Gel Measure liquid volumetrically Weigh to nearest 0.5 g or gravimetrically

*May have been performed in the field during sample recovery





EPA Method 25A

Source Location Name(s)

Underfire Combustion Stack

Pollutant(s) to be Determined

Total Gaseous Organic Concentration

Standard Method Specification

Other Parameters to be Determined from Train

Diluents (O2 and CO2) - USEPA Method 3A

Pollutant Sampling Information

N/A 60 minutes

No. of Sample Traverse Points

N/A Run 1 = 3, Runs 2-3 = 1

Sample Time per Point

Run 1 = 20 minutes, Runs 2-3 = 60 minutes

Actual Specification Used

N/A Sampling Rate Constant Rate

Constant Rate

Sampling Probe

Nozzle Material

Duration of Run

N/A

None

N/A Nozzle Design

N/A

Probe Liner Material Effective Probe Length Stainless Steel or Equivalent Stainless Steel

Sufficient to Traverse Points

11 feet

Probe Temperature Set-Point

Prevent Condensation (>230°F) 248°F±25°F

Particulate Filter

In-Stack Filter Optional

N/A Fritted Stainless Steel In-Stack Filter Material

External Filter Yes

Borosilicate Glass Fiber Mat

Glass Fiber Mat External Filter Material External Filter Set-Point Prevent Condensation (>230°F)

248°F±25°F

Sample Delivery System

Stainless Steel or Teflon Teflon Heated Sample Line Material Prevent Condensation (>230°F) 248°F±25°F Heated Sample Line Set-Point

Heated Sample Line Connections Probe Exit to Analyzer

Moisture Removal System N/A Probe to Moisture System and THC Analyzer Refrigerator-type condenser

Sample Pump Type N/A Diaphragm

Sample Pump Material

Non-reactive to sample gases Teflon

Sample Flow Control Constant Rate Constant Rate (±10%)

Non-Heated Sample Line Material N/A

Teflon

Non-Heated Sample Line Connections N/A Moisture Removal to Diluent Analyzers

Additional Filters Optional

N/A Particulate Removal

Additional Filter Location

Additional Filter Type

Filter Material

Ammonia (NH₃)

Optional Before Analyzers Quartz Fiber

Analyzer Description

Oxygen (O₂) EPA Method 3A (Paramagnetic)

EPA Method 3A (Paramagnetic) EPA Method 3A (NDIR) EPA Method 3A (NDIR)

Carbon Dioxide (CO₂) Sulfur Dioxide (SO₂) N/A Nitrogen Oxides (NO_x) N/A

Carbon Monoxide (CO)

N/A

Total Hydrocarbon (THC) EPA Method 25A (Flame Ionization Detection) Hydrogen Chloride (HCI) N/A

N/A

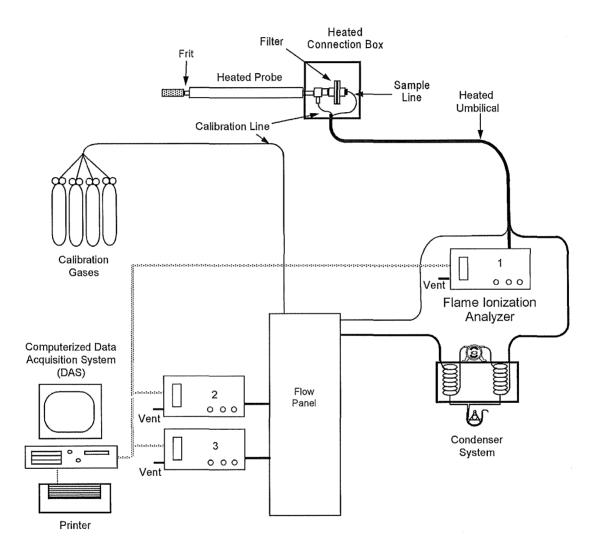
EPA Method 25A (Flame Ionization Detection)

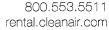
A - 20

EPA Method 25A

	Standard Method Specification	Actual Specification Used
Instrument Chan Banga		
Instrument Span Range	< 1.33 x Expected Maximum	0.00.400/
Oxygen (O ₂)	≤ 1.33 x Expected Maximum	0-22.13%
Carbon Dioxide (CO ₂)	- '	0-10.10%
Sulfur Dioxide (SO ₂)	N/A	N/A
Nitrogen Oxides (NO _x)	N/A	N/A
Carbon Monoxide (CO)	N/A	N/A
Total Hydrocarbon (THC)	1.5 to 2.5 x Expected Maximum	0-85.9 ppm
Hydrogen Chloride (HCI)	N/A	N/A
Ammonia (NH ₃)	N/A	N/A
Data Acquisition		
Data Recorder	Strip chart, Analog Computer or Digital Recorder	Analog Computer
Recorder Resolution	0.5 Percent of Span	0.1 Percent of Span
Data Storage	Manually or Automatic	Manually
Measurement Freq. <60 min. Sample Time	1-min. intervals or 30 measurements (less restrictive)	One reading per second
Recording Freq. <60 min. Sample Time	1-min. intervals or 30 measurements (less restrictive)	One Minute Average (60, 1 second readings)
Measurement Freq. >60 min. Sample Time	2-min. intervals or 96 measurements (less restrictive)	N/A
Recording Freq. >60 min. Sample Time	2-min. intervals or 96 measurements (less restrictive)	N/A
Calibration Gas Specifications		
Oxygen (O ₂)	EPA Protocol 1	EPA Protocol 1
Carbon Dioxide (CO ₂)	EPA Protocol 1	EPA Protocol 1
Sulfur Dioxide (SO ₂)	N/A	
Nitrogen Oxides (NO _x)	N/A	
Carbon Monoxide (CO)	N/A	
Total Hydrocarbon (THC)	EPA Protocol 1	EPA Protocol 1
Hydrogen Chloride (HCI)	N/A	
Ammonia (NH ₃)	N/A	
` "		

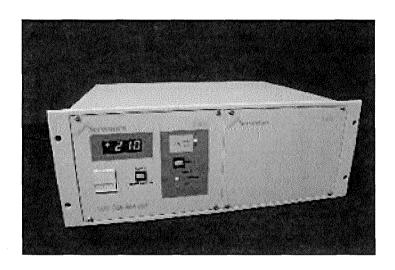
EPA Methods 3A and 25A Sampling Train Configuration







Servomex 1420C Oxygen Analyzer



RENTAL AND APPLICATION NOTES:

- Shipping Weight: 28 lbs.
- The analyzer measures the partial pressure of oxygen in the sample gas. Therefore, any change in sample pressure at the measuring cell will have an effect, which is proportional to the change in absolute pressure from the time of calibration.
- The Servomex 1420C/1415C can be plumbed together in a 19" rack mount. The combined weight is 44 lbs.
- These units are compatible with the older 1400B series.

SPECIFICATIONS:

- Weight: 12 lbs.

- Dimensions: 19" x 7" x 14".

- Power: 120VAC.

- Output: 0-1V or 4 - 20mA.

- Range: 0 - 25 & 100% O₂.

- Response Time (T_{so}): 2.5 sec.

- Accuracy: ± 0.1%.

- Flow Rate: 1 - 6 L/min.

- Inlet Pressure: 1-10 psig.

- Vent Pressure: 11.8 to 15.9 psia.

- Linearity: <u>+</u> 0.1%.

- Repeatability: \pm 0.1% O₂.

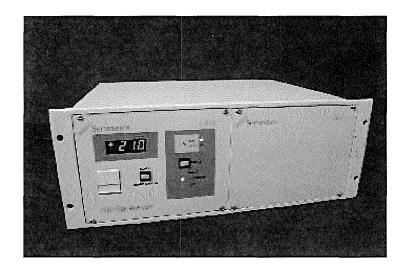
- Zero Drift: $< \pm 0.002\% O_2/hour$.

- Span Drift: $< \pm 0.002\%$ O₂/hour.

- Relative Humidity: 0 - 90% non-condensing.



Servomex 1415 CO₂ Analyzer



RENTAL AND APPLICATION NOTES:

- Shipping Weight: 28 lbs.
- The Servomex 1420C/1415C can be plumbed together in a 19" rack mount. The combined weight is 44 lbs.
- These units are compatible wiith the older 1400B series.

Specifications:

- Weight: 12 lbs.

- Dimensions: 19" x 7" x 14"

- Power: 120VAC.

- Output: 0-1v non-isolated or 4-20mA.

- Range: 0-20 & 25% CO₂.

- Response Time (T_{qn}) : <10 seconds.

- Accuracy: 1% of selected range.

- Flow Rate: 1 - 6 L/min.

- Inlet Pressure: 1 - 10 psig.

- Vent Pressure: 13.1 to 16.0 psia.

- Linearity: 1% of selected range.

- Repeatability: 1% of selected range.

- Zero Drift: 2% of full scale/week.

- Span Drift: 1% of reading/day.

- Relative Humidity: 0% - 90% non-condensing.

- Storage Temperature: -4°F to 158°F.

- Infrared Detector.



Thermo Model 55i Methane, Non-Methane Analyzer



RENTAL AND APPLICATION NOTES:

- Shipping Weight: 65 lbs.
- Designed for automated measurement of methane and non-methane hydrocarbons.
- Real time correction of THC readings.
- Carrier Gas; Nitrogen, combustion air, Hydrogen fuel.
- Utilizes a back-flush GC system to measure non-methane hydrocarbons directly.

Specifications:

- Weight: 50lbs.
- Dimensions: 16.75"x8.62"x23".
- Power: 105-125 VAC, 500w.
- Detection Method: Flame Ionization (FID)
- Lower Detection Limit: 20 ppb methane, 50ppb NMHC.
- Outputs: selectable voltage, RS232/RS485, TCP/IP, 10 status relays, and power fail indication, 4-20 mA isolated current output. Output is scalable to the exact range.
- Inputs: 16 Digital Inputs (standard) 8 0-10vds Analog optional.
- Range: 0-10ppm, 100ppm, 1000ppm; or 0-20pm, 200ppm, 2000ppm; or 0-50ppm, 500ppm, 5000ppm (select one option)
- Response Time: 70 sec. or less.
- Temperature: 15 to 35°C.
- Flow Rate: 500 ml/min.
- Span Drift: < 2% (24h) without auto calibration.
- Zero Drift: Auto-zero each cycle.
- Linearity: \pm 2% of span (at concentrations 10-100% of span).

End of Appendix Section