

Test Plan

Storage Box Number: 2018/12/64
(YYYY/MM/BOX#)

Permit #: **1040-0129**

Facility: **JCI**

Location: **Florence, SC**

Date: **November 20, 2018**

Source Tested: **CX Scrubber, Foundry Ventilation,
Slag Warehouse, & Melter**

Source Test Type: **Pb, PM**

ID: **01, 06, 10, 14**



Healthy People. Healthy Communities.

December 5, 2018

Mr. Kelly Roberts
Johnson Controls Battery Group, Inc.
1800 Paper Mill Road
Florence, SC 29501

Re: Johnson Controls CX Scrubber, Melter, Foundry Ventilation, & Slag Warehouse PM & Lead Test Plan Revision 01 - Submitted November 20, 2018

Dear Mr. Roberts:

The referenced site-specific test plan is approved by the Department. Any deviations from the plan, without prior approval from the Department, may be cause for rejecting the test results.

Regardless of the operating rate stated in the plan, the Department expects facilities to operate at rated capacity during stack tests. Facilities that conduct tests at less than rated capacity may have reduced and/or emission limits imposed. The level of restriction will be determined from the margin of compliance, operating rate, and other appropriate parameters.

The request to submit the test report 60 days after completion is approved.

If I can be of further assistance, please do not hesitate to call me at (803) 898-0834 or e-mail me at williadt@dhec.sc.gov.

Sincerely,

Derek T. Williams
Environmental Health Manager
Source Evaluation Section
SC DHEC Bureau of Air Quality

Cc: Compliance File 1040-0129

Ec: Michael Shroup, BAQ
Bryan Baxley, Pee Dee Region - Florence BEHS
Derek Brewster, TRC

Fw: Johnson Controls Protocol Revision

Shroup, Michael

Tue 11/20/2018 4:00 PM

To: Williams, Derek <williad@dhc.sc.gov>;

Categories: Red category

1 attachments (751 KB)

Protocol Cover Letter.pdf

Michael D. Shroup
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Sent: Tuesday, November 20, 2018 3:55 PM
To: Shroup, Michael
Subject: FW: Johnson Controls Protocol Revision

*** Caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***
Michael,

Apparently, I do not have the correct email address for Derek. I will keep searching, but if you are in the office, could you forward it to him?

Robert vandenMeiracker
Office Practice Leader – Air Quality Consulting



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Subject: Johnson Controls Protocol Revision

Derek and Michael,

Please see the attached revised protocol for the upcoming testing event for JCI. The revision relates to the monitoring of building negative pressure. If you have any questions, please let me know.

Thanks,

Rob

Robert vandenMeiracker
Office Practice Leader – Air Quality Consulting



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November 20, 2018

Michael Shroup
Air Quality Source Evaluation and Testing
Bureau of Air Quality
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Subject: Test Protocol Revision
Johnson Controls Battery Group, Inc. Florence Recycling Plant
Florence, South Carolina
Permits 1040-0129-CA, CB, CC, and CD

Dear Mr. Shroup:

TRC provided notification to SC DHEC of an upcoming stack test at the Johnson Controls Battery Group, Inc. Florence Recycling Plant (JCI) in a letter dated November 2, 2018. The stack test will involve lead, hydrogen sulfide, particulate, mercury and sulfur dioxide for various sources and is scheduled for mid-December 2018. Section 3.2 of the protocol identifies process data that will be collected during the stack test. JCI requests that SC DHEC allow use of data collected in accordance with the alternate monitoring plan (AMP) approved by United States Environmental Protection Agency (USEPA) in lieu of the building differential pressure data described in section 3.2. Thus, the following language will be deleted:

Total enclosure pressure differentials (CX crusher and smelter enclosure) – 15 minute averages that will include at least one reading per minute.

The following language will be added:

Alternative Monitoring Plan (AMP) data documenting flow differential between building inflow and outflow is a net negative, i.e., the total enclosure is under negative pressure.

Please note that JCI currently demonstrates compliance with the 40 CFR 63 Subpart X requirements based on the AMP; total enclosure differential pressure gauges are not used for demonstration of compliance with Subpart X. AMP data is monitored and recorded continuously. Since AMP data is the compliance methodology currently used

Michael Shroup
SC DHEC
November 20, 2018
Page 2

for Subpart X compliance and is a continuously recorded parameter, JCI recommends using this data during the upcoming stack test. A revised test protocol is provided for your review. Only section 3.2 and the cover page were modified.

If you have any questions, please call me at 864.787.5261.

Sincerely,

TRC Environmental Corporation



Robert vandenMeiracker
Office Practice Leader – Air Quality Consulting

Attachments: Test Protocol

cc: Kelly Roberts, JCI

November 2, 2018

Mr. Michael Shroup
Source Evaluation Section
Bureau of Air Quality
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Subject: Notification of Stack Testing
Johnson Controls Battery Group Inc. (JCI)
Permit No. 1040-0129-CA and CB

Dear Mr. Shroup:

JCI operates a secondary lead smelting facility under Permit No. 1040-0129-CA and 1040-0129-CB, located in Florence, South Carolina. The facility is subject to 40 CFR 63, Subpart X – National Emissions Standard for Hazardous Air Pollutants (NESHAPs) from Secondary Lead Smelting. The construction permit and Subpart X require initial performance testing for lead emissions and subsequent annual testing for all applicable sources. Based on previous stack testing completion dates the next round of tests will be conducted in December 2018 in accordance with Subpart X and Permit Section C. Source Test Schedule including the following:

Table 1 – Required Compliance Testing

Required Test Date	Source	Pollutants
December 2017	Unit 01 – CX Scrubber	Lead, H ₂ S*
	Unit 02 – CX FEU Vent	Lead
	Unit 06 – Melter & Charge Prep	PM, Lead, Hg, SO ₂
	Unit 07 – Furnace 1	PM, Lead, Hg
	Unit 08 – Furnace 2	PM, Lead, Hg
	Unit 09 – Furnace 3	PM, Lead, Hg
	Unit 10 – Foundry Ventilation	PM, Lead
	Unit 11a – Refining Kettles (Process)	PM, Lead, Hg
	Unit 12 – Refinery FEU Vent	PM, Lead
	Unit 14 – Slag Warehouse	Lead

* H₂S samples will be collected in a tedlar bag and analyzed by GC FPD at Enthalpy Analytical within 48 hours. The sampling system will consist of a Teflon sample line, an impinger containing citrate buffer and a non-contact "lung" to collect the sample. Analysis of the bag will follow EPA Method 16 modified to using a bag for sample collection.

JCI is required to submit a site specific test plan at least sixty (60) days prior to the proposed test date as required by 40CFR 63 Subpart X. However, if the only amendments to the previously approved test plan are to facility information, the before mentioned notification requirement does not apply and JCI is required to submit the amendments at least two (2) weeks prior to the proposed test date [SC Regulation 61-62.1 Section IV.B.5.b].

The content of the site specific test plans previously submitted to South Carolina Department of Health and Environmental Control (SC DHEC) in October 2014 with comments addressed in November 2014, and December 2014 has not been changed, with the exception of the dates and facility information. The same approach and test methods will be used. JCI plans to conduct a source test during the weeks of December 11 and December 17, 2018. An amended site specific test plan will be submitted to SC DHEC, in accordance with SC Regulation 61-62.1 Section IV.B.5.b, two weeks prior to the proposed test dates. The testing planned for December 2018 will include the following emission units and pollutants:

- Unit 01 – CX Scrubber: Pb, H₂S
- Unit 02 – CX FEU Vent: Pb
- Unit 06 – Charge prep and melter: PM, Pb, Hg, SO₂
- Unit 07 – Furnace 1: PM, Pb, Hg
- Unit 08 – Furnace 2: PM, Pb, Hg
- Unit 09 – Furnace 3: PM, Pb, Hg
- Unit 10 – Foundry Ventilation: Pb
- Unit 11A – Refining Process Stack: PM, Pb, Hg
- Unit 12 – Refining FEU Vent: PM, Pb
- Unit 14 – Slag Warehouse: Pb
-

If you have any questions about the included information, please contact me at 843.673.5525 or Robert vandenMeiracker with TRC at 864.234.9177.

Test Protocol

Performance Tests
on the CX Scrubber, Melter,
Foundry Ventilation, and Slag Warehouse
at the
Johnson Controls Battery Group, Inc.
Florence Recycling Plant

Florence, South Carolina

Prepared for:

Johnson Controls Battery Group, Inc.
Florence Recycling Plant
1800 Paper Mill Road
Florence, South Carolina 29501

Prepared by:

TRC Environmental Corporation
5540 Centerview Drive, Suite 100
Raleigh, North Carolina 27606

September 2015, Updated November 19, 2018

TRC Project No. 243155

September 2015, Updated November 2018
Revision 01

TEST PROTOCOL

**Performance Tests
On the CX Scrubber, Melter
Foundry Ventilation, and Slag Warehouse
At the
Johnson Controls Battery Group, Inc.
Florence Recycling Plant**

Florence, South Carolina

Prepared for

Johnson Controls Battery Group, Inc.
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1.0 INTRODUCTION

TRC Environmental Corporation (TRC) of Raleigh, North Carolina has been retained by Johnson Controls Battery Group, Inc. (JCI) to conduct performance tests at the Florence Recycling Plant located at 1800 Paper Mill Road in Florence, South Carolina, SC Permit Number 1040-0129-CA.

Annual performance testing for lead (Pb) will be conducted at the Foundry Ventilation stack (Unit ID 10), the CX Scrubber stack (Unit ID 01), the Melter Stack (Unit ID 06) and the Slag Warehouse stack (Unit ID 14). Additionally, testing for particulate matter (PM) will be conducted on the Slag Warehouse. All testing will be conducted while the unit is operating at greater than 90% of maximum normal load under steady state conditions.

Lead testing is being performed as required by 40 CFR 63 Subpart X, Section 63.543(g)(1) and Section II.C. of permit 1040-0129-CA. All other testing described in this protocol is being conducted in accordance with Section II.C. of permit 1040-0129-CA. All testing conducted as part of this test plan is a repeat of the 2014 test program. The testing at the Slag Warehouse will be the first test for a like-for-like replacement of the baghouse but is a repeat of the previous year's test program. The amendments made to this 2015 test plan are reducing the scope of pollutants being measured. This test plan will measure lead at the sources listed with the addition of particulate at the Slag Warehouse.

FACILITY CONTACT INFORMATION

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2.0 PROJECT OVERVIEW

2.1 SCOPE OF WORK

Testing will be conducted for lead (Pb) at the Foundry Ventilation, the CX Scrubber, the Melter and the Slag Warehouse. Additionally, samples will be collected for particulate matter (PM) on the Slag Warehouse. The test program approach involves conducting a series of three test runs at each location using EPA Reference Methods.

The required measurement parameters and test methods to accomplish these objectives are:

40 CFR Part 60, Appendix A, EPA Methods

- Method 1 and 2 Volumetric Flow Rate Determination
- Method 3 or 3A Oxygen and Carbon Dioxide
- Method 4 Moisture
- Method 5 Particulate matter
- Method 29 Lead

2.2 OPERATING SCHEDULE

Performance testing for lead and particulate matter will be conducted while the designated unit is operating under maximum representative operating conditions defined as operation at greater than 90% of capacity throughout the test period. Process rates to be recorded are in **Table 2-1**.

**TABLE 2-1
PROCESS RATES**

Source	Process Rate Description	Design Rate
CX	Batteries (tons/hr) broken	24.8 tons/hour ²
Melter and Charge Preparation	Furnaces lead production and	4.72 tons/hour/furnace ¹
	Melter lead production	4.83 tons/hour (melter) ¹
Foundry Ventilation	Furnaces lead production	4.72 tons/hour/furnace ¹
Slag Warehouse	Furnaces lead production	4.72 tons/hour/furnace ¹

¹ The process rate will be defined as the hourly average of the batch process. The charging start time and mass will be logged as well as the final tap time and mass.

² The hourly rate will be calculated from the total number of pallets processed during the test run. Johnson Control has an average weight per pallet that they will apply to the total number of pallets processed. The pallet count will be logged during each test run.

3.0 FACILITY DESCRIPTION

Johnson Controls Battery Group, Inc. – Florence Recycling Plant operates several processes in which lead-acid batteries are recycled.

3.1 SITE LOCATION AND SOURCE DESCRIPTION

Each emission unit in this test program is equipped with an individual, dedicated exhaust stack. The CX Scrubber (Unit ID 01) consists of multiple processes in the preparation of lead-acid batteries for recycling. The control equipment for the process is a plate scrubber. The Melter and Charge Prep Area (Unit ID 06) consists of the charge preparation area and a rotary lead melting furnace rated at 6.32 MMBtu/hr fired on natural gas. The Melter and Charge Prep Area is controlled by a baghouse system with HEPA filtration. The Foundry Ventilation system (Unit ID 10) provides negative pressure on the foundry building for collecting fugitive dust source emissions. The Foundry Ventilation is controlled by a baghouse with HEPA filtration. The Slag Warehouse (Unit ID 14) collects fugitive dust source emissions from the slag warehouse. The emissions are controlled by a baghouse with HEPA filtration.

Complete descriptions of each location will be documented in the final test report. The test report will include all EPA Method 1 parameters including stack diameter and upstream / downstream measurements as well as cyclonic flow determinations.

3.2 PLANT PROCESS DATA

JCI personnel will be responsible for the documentation of facility operating conditions during the test program. Plant operating data collected by JCI plant personnel will be included in the final report. The process data may include and is not limited to:

- Process operating rates – as outlined in **Table 2-1**
- Slag Warehouse and Foundry Ventilation Baghouses and HEPAs pressure differential – readings collected on a per shift basis
- CX Scrubber pressure drop – readings collected every 15 minutes
- CX Scrubber liquid flow rate – readings collected every 15 minutes
- CX Scrubber pH – readings collected once per shift
- CX Scrubber liquid pressure – readings collected once per shift
- CX scrubber air flow as indicated by fan amps – readings collected once per shift
- Alternative Monitoring Plan (AMP) data documenting flow differential between building inflow and outflow is a net negative, *i.e.*, the total enclosure is under negative pressure.

4.0 TEST METHODS AND PROCEDURES

4.1 OVERVIEW

This section describes the procedures that the testing contractor will follow during the field sampling program. Throughout the program, the testing contractor will follow EPA Reference Methods 40 CFR Part 60 Appendix A and Appendix B sampling protocols. The testing contractor project manager, the JCI project coordinator and South Carolina Department of Health and Environmental Control (SC DHEC) will approve deviations from the specified test methods. Modifications will be documented in the final report.

The remainder of this section is divided into the following subsections: Field Program Description, Pre-sampling Activities, and Onsite Sampling Activities.

4.2 FIELD PROGRAM DESCRIPTION

The following test methods will be used:

The test methods to be utilized in accordance with 40 CFR Part 60 will be as follows:

- EPA Method 1 Sample Velocity Traverse for Stationary Sources
- EPA Method 2 Determination of Stack Gas Velocity and Volumetric Flow Rate (Type S Pitot tube)
- EPA Method 3 Determination of Oxygen and Carbon Dioxide Concentrations in Emissions from Stationary Sources
- EPA Method 3A Determination of Oxygen and Carbon Dioxide Concentrations in Emissions from Stationary Sources (Instrumental Analyzer Procedure)
- EPA Method 4 Determination of Moisture Content in Stack Gases
- EPA Method 5 Determination of Filterable Particulate from Stationary Sources
- EPA Method 29 Determination of Metals Emissions from Stationary Sources

4.3 PRE-SAMPLING ACTIVITIES

Pre-sampling activities include equipment calibration and other miscellaneous tasks. Each of these activities are described or referenced in the following subsections. Other pre-sampling activities include team meetings, equipment packing, and finalization of all details leading up to the coordinated initiation of the sampling program.

4.3.1 Equipment Calibration

The testing contractor will follow an orderly program of positive actions to prevent the failure of equipment or instruments during use. Preventative maintenance and careful calibration help to ensure accurate measurements from field and laboratory instruments.

Once the equipment has gone through the cleaning and repair process, it is then calibrated. All equipment that is scheduled for field use is cleaned and checked prior to calibration. Once the equipment has been calibrated, it is packed and stored to ensure the integrity of the equipment. An adequate supply of spare parts is taken in the field to minimize downtime from equipment failure.

Inspection and calibration of the equipment is a crucial step in ensuring the successful completion of the field effort. All equipment is inspected for proper operation and durability prior to calibration. Calibration of the following equipment is conducted in accordance with the procedures outlined in EPA documents entitled "*Quality Assurance Handbook for Air Pollution Measurement Systems; Volume III - Stationary Source Specific Methods*" (EPA-600/4-77-027b) and 40 CFR Part 60 Appendix A. All calibrations will be performed prior to test program.

4.3.2 Source Sampling Equipment

Each sampling console dry gas meter is calibrated with critical orifices or by comparison to a reference gas meter. The resulting gas meter coefficient (γ or gamma) and the orifice pressure differential ($\Delta H@$) are clearly labeled on the meterbox as applicable. The pitot tubes are checked for conformance to the geometric specification in EPA Method 2 and are assigned a coefficient of 0.84. Thermocouples are initially calibrated by comparison with an ASTM-3F mercury-in-glass thermometer at three points. Each thermocouple will agree within 1.5 percent of the reference thermometer, expressed in Kelvin, throughout the entire calibration range. Digital temperature indicators are checked by comparing the indicator reading with a series of input signals from a digital readout calibrator.

4.4 ONSITE SAMPLING ACTIVITIES

4.4.1 Velocity Measurements

Velocity traverses will be conducted at each stack with an S-type pitot assembly in accordance with EPA Reference Methods 1 and 2. An S-type pitot tube with an attached inclined manometer will be used to measure the exhaust velocities at the sampling location. An attached Type-K thermocouple with remote digital display will be used to determine the flue gas temperature. During the test program, velocity measurements will be conducted during each test run while operating the isokinetic sampling train(s). The required number of velocity measurement points for each sampling location will be determined following EPA Method 1.

Cyclonic flow checks will be conducted in accordance with Section 2.4 of EPA Method 1. This procedure is referred to as the nulling technique. An S-type pitot tube connected to an inclined manometer will be used in this method. The pitot tube will be positioned at each traverse point so that the face openings of the pitot tube are perpendicular to the stack cross-sectional plane. This position is called the "0° reference". The velocity pressure (ΔP) measurement is noted. If the ΔP reading is zero, the cyclonic angle is recorded as 0°. If the ΔP reading is not zero, the pitot tube is rotated clockwise or counter clockwise until the ΔP reading becomes zero. This angle is then measured with a leveled protractor and reported to the nearest degree. After this null technique is applied at each traverse point, the average of the cyclonic angles is calculated. If this average is less than 20°, the flow condition is acceptable to test.

4.4.2 Flue Gas Moisture

Moisture will be determined for each test run according to EPA Reference Method 4, "*Determination of Moisture Content in Stack Gases*". The principle of this method is to remove the moisture from the sample stream and determine moisture either volumetrically or gravimetrically. Method 4 will be used in conjunction with the metals and sampling train. A stand-alone moisture train will consist of four impingers. The first two impingers will contain water, the third will remain empty and the fourth will contain silica gel. Stand-alone Moisture samples will be collected from a single point for 30 minutes. Each moisture sample collected will be applied to two volumetric flow measurements.

4.4.3 Flue Gas Molecular Weight

Molecular weight will be determined for each test run according to EPA Reference Method 3 or 3A, "*Determination of Dry Molecular Weight*". Concurrent with the isokinetic sampling, an integrated tedlar bag sample will be collected. The bag will be analyzed with an Orsat analyzer for the percent oxygen and carbon dioxide in the gas stream. This data will be used for determining the dry molecular weight of the stack gas. Instrumental reference method sampling for oxygen and carbon dioxide may be used for determination of flue gas molecular weight. Details of the instrumental procedure are found in Section 4.4.5.

4.4.4 Particulate Matter and Metals

Sample Collection. Samples are withdrawn isokinetically from the stack using an EPA Method 5 and 29 sampling train. The sampling train will consist of a glass nozzle, a heated glass probe with a Type S Pitot tube attached, a heated filter, four chilled impingers, and a metering console. The filter will be a tared quartz fiber filter maintained at a temperature of $248^{\circ}\text{F} \pm 25^{\circ}\text{F}$. The first two impingers will each contain 100 ml of 5% nitric acid (HNO_3) / 10% hydrogen peroxide (H_2O_2) reagent, the third will remain empty and the fourth will contain pre-weighed silica gel. Each point will be sampled for an equal amount of time, resulting in net run times of 240 minutes and a minimum sample volume of 70 dry standard cubic feet. The actual number of sampling points will be determined after evaluating the Method 1 criteria. Test runs on the CX scrubber will be 120 minutes in duration.

Sample Recovery. The sample train will be transported to the on-site trailer for clean-up. The filter is removed from the filter holder and placed in a petri dish. The impingers are weighed prior to sample train recovery. The silica gel is returned to the original container. The volume of water vapor condensed in the impingers and the volume of water vapor collected in the silica gel are summed and entered into moisture content calculations. All front-half components of the sampling train including the nozzle, probe, and filter holder are rinsed with acetone into a reagent jar followed by 100 ml nitric acid rinse into a separate reagent jar. The first through third impingers are emptied into a reagent jar. The back-half of the filter holder through the third impinger are then rinsed with 100 ml 0.1N HNO_3 into the same jar. Three (3) unused filters from the same lot and treated in the same manner as above will be designated as a blank. Reagent blanks will be collected as described in EPA Method 29. A spike is added to one run during analysis to obtain the recovery efficiency.

Sample Analysis. EPA Method 5 analytical procedures are used to analyze the filter and acetone rinse for total filterable particulate matter following the procedures outlined in section 8.3.1.1 and 8.3.2 of Method 29. EPA Method 29 analytical procedures are used to analyze the sample train for antimony lead (Pb). Method 29 front and back half fractions are analyzed separately. Duplicate metals analysis is performed for approximately 10% of the samples for metals except for mercury. All mercury samples are analyzed in duplicate.

4.4.5 Continuous Emissions Monitoring for O₂ and CO₂

Oxygen (EPA Method 3A) and carbon dioxide (EPA Method 3A) will be measured to calculate stack gas molecular weight for flow rate determination. The instrumental test data will be collected concurrent with the isokinetic sampling and volumetric flow rates will determined during the isokinetic sampling will be applied.

The reference method CEMS sampling train will start with a stainless-steel sampling probe. The sample stream will be then drawn through a glass fiber filter, heated (248°F ± 25°F) Teflon sample line, and a sample conditioner to remove the moisture and particulate from the gas stream. The sample will then be drawn through Teflon tubing by a leak-free Teflon pump to a stainless-steel sample manifold with an atmospheric by-pass rotameter. The O₂ and CO₂ analyzers will withdraw samples from this manifold.

CEMS data will be recorded as averages by a digital data logger designed to receive and log instrument signals. The results will be expressed in percent for O₂ and CO₂.

5.0 CALCULATIONS

5.1 Concentration, grains per dry standard cubic foot

$$C \text{ (gr/dscf)} = 15.4324 \times \frac{\text{g}}{\text{Vmstd}}$$

Where:

C	= Concentration, gr/dscf
15.4324	= conversion gr/mg, (7,000 gr/lb) / (453.592 mg/lb)
Vmstd	= Volume metered @ standard conditions

5.2 Emission Rate, pounds per hour

Concentrations, parts per million (ppm) and milligrams per dry standard cubic meter (mg/dscm) will be corrected to 7% oxygen using the following equation:

$$R_t \text{ (lb/hr)} = \frac{60}{453.592} \times \frac{\text{g}}{\text{Vmstd}} \times Q_{sd}$$

OR

$$R_t \text{ (lb/hr)} = \frac{60 \times \text{fwt} \times Q_{sd}}{385.3 \times 10^6}$$

Where:

R _t	= Emission Rate, lb/hr
Q _{sd}	= Volumetric Flow Rate, DSCFM
F _w t	= Formula Weight of Pollutant, lb/lb-mole

6.0 QUALITY ASSURANCE

6.1 OVERVIEW

The testing contractor management will be fully committed to an effective Quality Assurance/Quality Control Program whose objective is the delivery of a quality product. That product is data resulting from field measurements, sampling and analysis activities, engineering assessments, and the analysis of gathered data for planning purposes. The Quality Assurance Program works to provide complete, precise, accurate, representative data in a timely manner for each project, considering both the project's needs and budget constraints.

This section highlights the specific QA/QC procedures to be followed on this Test Program.

6.2 FIELD QUALITY CONTROL SUMMARY

6.2.1 Calibration Procedures

Calibration of the field sampling equipment will be performed prior to the field sampling effort. Copies of the calibration sheets will be submitted to the field team leader to take onsite and for the project file. Calibrations will be performed as described in the EPA publications "*Quality Assurance Handbook for Air Pollution Measurement Systems; Volume III - Stationary Source Specific Methods*" (EPA-600/4-77-027b) and EPA 40 CFR Part 60 Appendix A.

The following EPA approved alternative will be used for thermocouple calibration:

Post-test thermocouple calibration will be performed in accordance with EPA ALT-011 using a single point calibration against an ASTM mercury-in-glass thermometer in addition to a continuity check of the thermocouple. The continuity check involves verifying that the thermocouple read-out trends in the appropriate direction when exposed to a temperature change. A complete copy of EPA ALT-011 is available from EPA from the EMC website at <http://www.epa.gov/ttn/emc/>.

6.3 DATA REDUCTION, VALIDATION, AND REPORTING

Specific QC measures will be used to ensure the generation of reliable data from sampling and analysis activities. Proper collection and organization of accurate information followed by clear and concise reporting of the data is a primary goal in all projects.

6.3.1 Field Data Reduction

Standardized forms will be used to record field sampling data. The data collected will be reviewed in the field by the Field Team Leader and at least one other field crew member. Errors or discrepancies will be noted in a field log.

6.3.2 Data Validation

The testing contractor supervisory and QC personnel will use validation methods and criteria appropriate to the type of data and the purpose of the measurement. Records of all data will be maintained, including that judged to be an "outlying" or spurious value. The persons validating the data will have sufficient knowledge of the technical work to identify questionable values.

Field sampling data will be validated by the Field Team Leader and/or the Field QC Coordinator based on their review of the adherence to an approved sampling protocol and written sample collection procedure.

The following criteria will be used to evaluate the field sampling data:

- Use of approved test procedures;
- Proper operation of the process being tested;
- Use of properly operating and calibrated equipment;
- Leak checks conducted before and after tests;
- Use of reagents conforming to QC specified criteria; and
- Maintain proper chain-of-custody.

6.3.3 Data Reporting

All data will be reported in standard units depending on the measurement and the ultimate use of the data. The bulk of the data will be processed following delivery of the laboratory results.

6.4 STATIONARY SOURCE AUDIT SAMPLES

Stationary source audit samples will be ordered for this test program. The order will include an EPA Method 29 audit for metals on filter paper and in impinger solutions. The analysis will be for Lead. The audit sample will be analyzed with the field samples.

6.5 EXCEPTIONS

Any deviations from this test plan must be approved by the JCI project coordinator and SC DHEC. Deviations will be documented in the final report.

7.0 FINAL REPORT SUMMARY

This section will serve as an outline of the Final Reports for submittal to JCI. This test program is projected to occur the week of November 30, 2015. Two (2) test reports will be submitted summarizing the results of the test program. The performance test report will be submitted within 60 days of completion of the test program. The report will follow the same basic outline as described in the following sections.

7.1 INTRODUCTION

The introduction will include the following items:

- The overall goals of the test;
- The specific goals of the test;
- Names and locations of all businesses, contractors, and agencies involved in the tests;
- Dates and duration of the test period;
- A brief outline of the remainder of the report.

7.2 SUMMARY AND DISCUSSION OF RESULTS

This section will be a two-part discussion summarizing the results and conclusions drawn from the data.

7.2.1 Summary of Results

This section will provide an overview of the entire stack gas sampling effort. Emission rates and concentrations will be expressed in the units as noted in Section 6.3.

Process upsets and deviations from the Test Plan will be fully described. Events, whether field or laboratory, pertinent to this project that may have an impact on the quality of the data will be fully documented in this section.

7.2.2 Discussion of Results

In this section, the testing contractor will correlate the emissions data with pertinent process data to further explain the results. Explanations or justifications for data discrepancies will be given. Areas where the data may appear technically weak will be pointed out.

7.3 PROCESS DESCRIPTION AND OPERATION

This section of the report will be in two parts, the process description subsection and the process operation subsection.

7.3.1 Process Description

A complete step-wise description of the entire process will be documented in this subsection. Design capacities and all pertinent process parameters will be listed.

7.3.2 Process Operations

Actual process data relevant to the emissions testing will be provided by the facility for inclusion in an appendix.

7.4 SAMPLING LOCATIONS

This will be similar to Section 3.0 of this Test Plan. Any deviations will be addressed.

7.5 SAMPLING PROCEDURES

This section will describe the methods used and any deviations from the Test Plan. This section will include a full discussion of any problems encountered during sampling.

7.6 DATA REPORTING

The data generated from this test program will be organized into tables depicting the pollutant concentrations from the sampling locations. All data undergoes extensive QA/QC procedures validating the results. All data will be reported in standard units depending on the measurement and the ultimate use of the data.

7.7 APPENDICES

The following appendices will be included in the Final Report:

- A. Summary of Results and Example Calculations
- B. Field Sampling Data Sheets
- C. Laboratory Analytical Data
- D. Equipment Calibration Sheets
- E. Process Data
- F. Qualified Individual Certification

7.8 REPORT APPROVAL

Senior staff members and QA personnel will review the final report for accuracy and completeness prior to submittal.

7.9 ELECTRONIC REPORTING TOOL

The data collected to meet the 40 CFR 63 Subpart X requirements will be entered in the EPA Webfire database using the EPA Electronic Reporting Tool. This data will be populated within 60 days of the test program completion.

SAMPLE LOG and CHAIN OF CUSTODY RECORD

Page # 1 of 3
 First Analytical Laboratory, Inc.
 (919) 942-8807

Client: TRC Environmental Corporation
 Location: Raleigh, NC
 Project Name: Johnson Controls
 Florence, SC

TRC Project Manager:
 Telephone No. Derek Brewer
 (919) 258-8233

TRC Project No. 210315

Carrier or Delivery:
 Date Delivered to Lab: Delivered by TRC
 Results Due Date: Standard TAT

Sample ID, No. and Description

Location :	Method	Run #	Fraction :	Sample Date :	Sample Type :	Type of Container :	Analysis Requested
	M29	M29-1	Filter		Filter	Petri	Pb & Hg by M29
	M29	M29-1	FH HNO ₃ Rinse		HNO ₃	250 ml glass	Pb & Hg by M29
	M29	M29-1	HNO ₃ /H ₂ O ₂		HNO ₃ /H ₂ O ₂	950 ml glass	Pb & Hg by M29
	M29	M29-1	Impinger 4		HNO ₃	250 ml glass	Pb & Hg by M29
	M29	M29-1	KMnO ₄		KMnO ₄	500 ml Amber	Hg by M29
	M29	M29-1	HCl		HCl in H ₂ O	500 ml glass	Hg by M29
	M29	M29-2	Filter		Filter	Petri	Pb & Hg by M29
	M29	M29-2	FH HNO ₃ Rinse		HNO ₃	250 ml glass	Pb & Hg by M29
	M29	M29-2	HNO ₃ /H ₂ O ₂		HNO ₃ /H ₂ O ₂	950 ml glass	Pb & Hg by M29
	M29	M29-2	Impinger 4		HNO ₃	250 ml glass	Pb & Hg by M29
	M29	M29-2	KMnO ₄		KMnO ₄	500 ml Amber	Hg by M29
	M29	M29-2	HCl		HCl in H ₂ O	500 ml glass	Hg by M29
	M29	M29-3	Filter		Filter	Petri	Pb & Hg by M29
	M29	M29-3	FH HNO ₃ Rinse		HNO ₃	250 ml glass	Pb & Hg by M29
	M29	M29-3	HNO ₃ /H ₂ O ₂		HNO ₃ /H ₂ O ₂	950 ml glass	Pb & Hg by M29
	M29	M29-3	Impinger 4		HNO ₃	250 ml glass	Pb & Hg by M29
	M29	M29-3	KMnO ₄		KMnO ₄	500 ml Amber	Hg by M29
	M29	M29-3	HCl		HCl in H ₂ O	500 ml glass	Hg by M29

Released by TRC: _____
 Signature: _____ Date: _____
 Accepted by Laboratory: _____
 Signature and Date: _____