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DIVISION OF ENVIRONMENTAL MANAGEMENT

Air Quality Section

August 17, 1988

M E M O R A N D U M

To: Ken Schuster / Clyde E. Fuller

From: Michael Y. Aldridge *MYA*

Subject: Alliance Contracting Corporation
Durham, Durham County, North Carolina
Particulate and Visible Emissions Testing of a
Baghouse installed on an Asphalt Plant Dryer
Conducted May 26, 1988 by
Entropy Environmentalists, Inc.

A report of the subject testing has been reviewed and is found to be acceptable. The results appear reliable and indicate that compliance with the applicable particulate emission standard was being achieved during the test.

The emission standard that applies to the subject facility is 40 CFR 60, Subpart I, which limits particulate emissions to 0.04 grains per dry standard cubic foot and visible emissions to 20 percent opacity.

The particulate emission rate demonstrated by the test results was 0.002 grains per dry standard cubic foot.

Visible emissions were zero for most of the test period with a few isolated instances of 5 percent opacity.

The plant is rated at 200 tons per hour and was operating at 150 tons per hour (75 percent capacity) during the test. While this is a lower operating rate than is usually considered desirable for testing such a facility, the margin of compliance and the degree of control provide additional evidence to support this test as an adequate demonstration of compliance.

Compliance is indicated for particulate and visible emissions.

cc: Central File via Lee Daniel

ENTROPY

ENVIRONMENTALISTS INC.

POST OFFICE BOX 12291
RESEARCH TRIANGLE PARK
NORTH CAROLINA 27709-2291
919-781-3550

STATIONARY SOURCE SAMPLING REPORT

REFERENCE NO. 5911

ALLIANCE CONTRACTING CORPORATION
DURHAM, NORTH CAROLINA

PARTICULATE EMISSIONS AND PLUME OPACITY
COMPLIANCE TESTING

ROTARY DRYER SYSTEM STACK

MAY 26, 1988

REPORT CERTIFICATION

The sampling and analysis performed for this report was carried out under my direction and supervision.

Date June 8, 1988

Signature

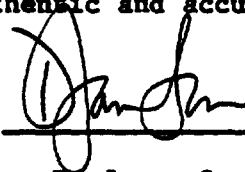


Willis S. Nesbit

I have reviewed all testing details and results in this test report and hereby certify that the test report is authentic and accurate.

Date June 8, 1988

Signature



D. James Grove, P.E.

RECEIVED
JUN 16 1988

AIR QUALITY TECH SERVICES

ENTROPY

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INTRODUCTION

1.1 Outline of Test Program. Stationary source sampling was performed for Alliance Contracting Corporation in Durham, North Carolina, on May 26, 1988. Three sets of concurrent EPA Method 5 and Method 9 runs were performed at the rotary dryer system stack to determine the particulate emissions and the plume opacity, respectively. The testing was conducted for compliance purposes.

1.2 Test Participants. Table 1-1 lists the personnel present during the test program.

TABLE 1-1
TEST PARTICIPANTS

Alliance Contracting Corporation	I. E. Harris Test Coordinator
	Mickey Hicks Plant Operator
North Carolina Department of Natural Resources and Community Development	Clyde E. Fuller Test Observer
Entropy Environmentalists, Inc.	Willis S. Nesbit Project Supervisor
	Joseph W. Mullen Engineering Technician
Eastern Technical Associates	Paul A. Minor Plume Opacity Observer

SUMMARY OF RESULTS

2.1 Presentation. Table 2-1 presents the particulate emissions for the testing performed May 26, 1988, at the rotary dryer system stack. Detailed test results are presented in Appendix A; field and analytical data are given in Appendix B.

2.2 Plume Opacity Observations. Plume opacity observations were conducted concurrently with the particulate emissions testing. The majority of the readings were zero, with the highest single reading at 5%. Due to the near absence of a visible plume, the observations were not summarized; refer to the field data sheets in Appendix B for the results.

2.3 Average Emission Rate. The average emission rate for the testing was 0.426 pounds per hour. The average concentration was 0.00232 grains per dry standard cubic foot.

TABLE 2-1
PARTICULATE TESTS SUMMARY OF RESULTS
Rotary Dryer System Stack

	1 ----	2 ----	3 ----
Run Date	5/26/88	5/26/88	5/26/88
<u>Test Train Parameters:</u>			
Volume of Dry Gas Sampled, SCF*	60.866	60.690	58.502
Percent Isokinetic	102.4	102.4	102.5
<u>Flue Gas Parameters:</u>			
Temperature, Degrees F	168	170	174
Volumetric Air Flow Rates SCFM*, Dry	21,710	21,651	20,839
ACFM, Wet	29,433	29,358	28,632
<u>Method 5 Results:</u>			
Catch, Milligrams	9.5	9.0	8.6
Concentration, Grains/DSCF*	0.002409	0.002289	0.002269
Emission Rate, Lbs/Hour	0.4482	0.4247	0.4052

* 68 Degrees F -- 29.92 Inches of Mercury (Hg)

PROCESS DESCRIPTION AND OPERATION

3.1 General. Alliance Contracting Corporation operates a batch mix asphalt plant in Durham, North Carolina. Aggregate is heated, dried, and tumbled in a rotary dryer. From the dryer, the aggregate travels to an elevator which carries it to a screen for sizing into hot storage bins. The graded aggregate is mixed with liquid asphalt in a pug mill, and then is loaded onto trucks in 6,000-pound batches.

3.2 Source Air Flow. Figure 3-1 is an air flow schematic showing the passage of the flue gases exhausted by the rotary dryer.

3.3. Operation During Testing. According to Alliance Contracting Corporation, 150 tons per hour of asphalt were produced during testing.

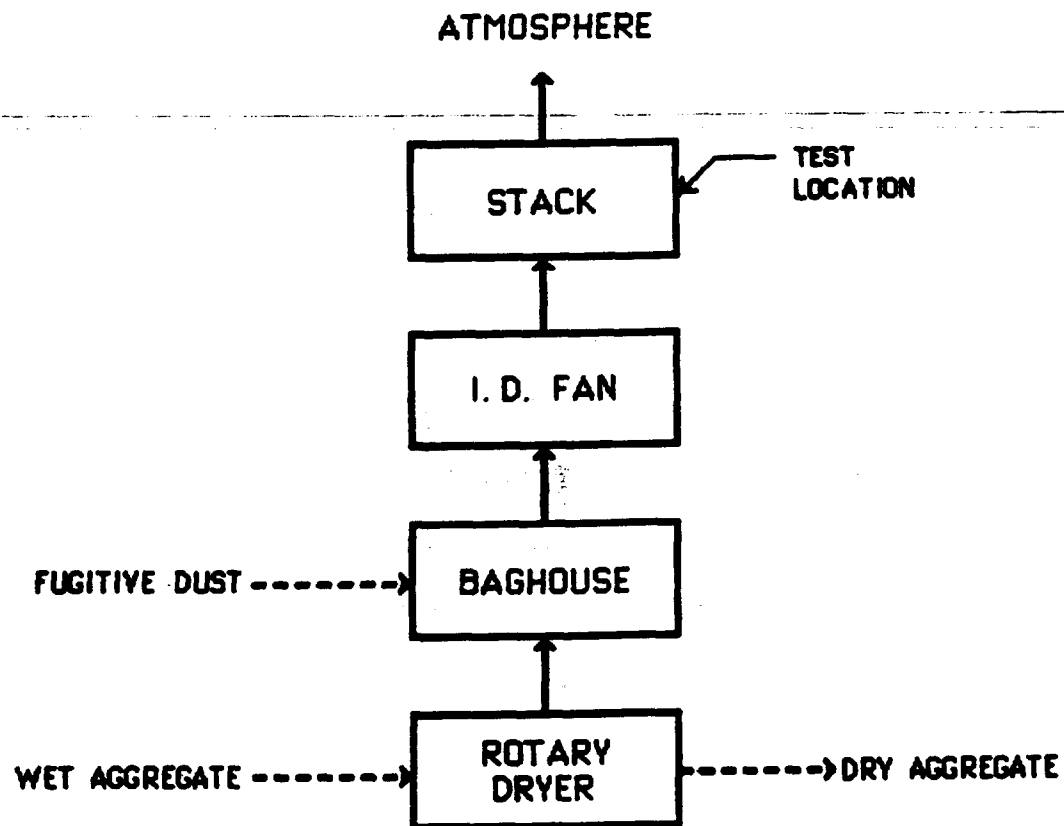


FIGURE 3-1. ROTARY DRYER SYSTEM AIR FLOW SCHEMATIC.

SAMPLING AND ANALYTICAL PROCEDURES

4.1 General. All sampling and analytical procedures were those recommended by the United States Environmental Protection Agency and the North Carolina Department of Natural Resources and Community Development. Descriptions of the sampling equipment and procedures (extracted from 40 CFR 60) are provided in Appendix D.

4.2 Sampling Points. The number and location of the sampling points were determined according to EPA Method 1. The stack cross section was divided into 18 equal areas with six sampling points on each of three traverse axes, as shown in Figure 4-1.

4.3 Volumetric Air Flow Rates

4.3.1 Flue Gas Velocity. EPA Method 2 was used to take the velocity measurements during the traverses of the stack cross section.

4.3.2 Flue Gas Composition. During run 3, a multipoint, integrated flue gas sample was collected and analyzed using EPA Method 3; the analytical results were used to determine the flue gas composition and molecular weight for all runs.

4.3.3 Flue Gas Moisture. Moisture content was determined by analyzing the sampling train impinger reagents according to the procedures outlined in EPA Method 5.

4.4 Emissions Determinations. EPA Method 5 sampling and analytical procedures were used to determine the particulate emissions. Each of the 18 points was sampled for 3.5 minutes, resulting in a net run time of 63 minutes.

4.5 Plume Opacity. The procedures outlined in EPA Method 9 were followed in determining the plume opacity.

4.6 Equipment Calibration. Pertinent calibration data are provided in Appendix C.

TRAVERSE POINTS

3 AXES
6 POINTS/AXIS
18 TOTAL POINTS

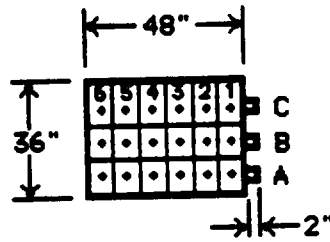
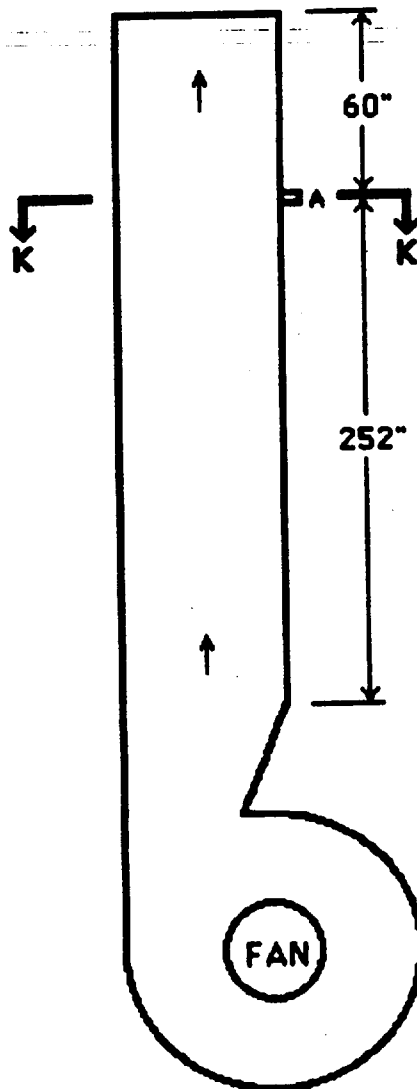
**SECTION K-K**

FIGURE 4-1. ROTARY DRYER SYSTEM STACK TEST LOCATION.

TEST RESULTS AND EXAMPLE CALCULATIONS

PLANT: Alliance Contracting Corporation, Durham, North Carolina

RUN #	DATE	SAMPLING LOCATION	OPERATOR		
1	5/26/88	Rotary Dryer System Stack	Willis S. Nesbit		
2	5/26/88	Rotary Dryer System Stack	Willis S. Nesbit		
3	5/26/88	Rotary Dryer System Stack	Willis S. Nesbit		
			1	2	3
			----	----	----
	Run Start Time		800	932	1105
	Run Finish Time		905	1037	1220
	Net Sampling Points		18	18	18
Theta	Net Run Time, Minutes		63.00	63.00	63.00
Dia	Nozzle Diameter, Inches		0.309	0.309	0.309
Cp	Pitot Tube Coefficient		0.840	0.840	0.840
Y	Dry Gas Meter Calibration Factor		1.010	1.010	1.010
Pbar	Barometric Pressure, Inches Hg		29.80	29.80	29.80
Delta H	Avg. Pressure Differential of Orifice Meter, Inches H2O		2.877	2.866	2.691
Vm	Volume of Metered Gas Sample, Dry ACF		61.356	61.974	60.094
tm	Dry Gas Meter Temperature, Degrees F		79	86	89
Vm(std)	Volume of Metered Gas Sample, Dry SCF*		60.866	60.690	58.502
Vlc	Total Volume of Liquid Collected in Impingers & Silica Gel, mL		174.0	169.0	172.5
Vw(std)	Volume of Water Vapor, SCF*		8.190	7.955	8.120
XH2O	Moisture Content, Percent by Volume		11.9	11.6	12.2
Mfd	Dry Mole Fraction		0.881	0.884	0.878
XCO2	Carbon Dioxide, Percent by Volume, Dry		3.1	3.1	3.1
XO2	Oxygen, Percent by Volume, Dry		16.7	16.7	16.7
XCO+N2	CO + N2, Percent by Volume, Dry		80.2	80.2	80.2
Md	Dry Molecular Weight, Lb/Lb-Mole		29.16	29.16	29.16
Ms	Wet Molecular Weight, Lb/Lb-Mole		27.84	27.87	27.80
Pg	Flue Gas Static Pressure, Inches H2O		-0.10	-0.13	-0.14
Ps	Absolute Flue Gas Press., Inches HG		29.79	29.79	29.79
ts	Flue Gas Temperature, Degrees F		168	170	174
Delta p	Average Velocity Head, Inches H2O		0.4280	0.4249	0.4006
vs	Flue Gas Velocity, Feet/Second		40.88	40.78	39.77
A	Stack/Duct Area, Square Inches		1,728	1,728	1,728
Qsd	Volumetric Air Flow Rate, Dry SCFM*		21,710	21,651	20,839
Qaw	Volumetric Air Flow Rate, Wet ACFM		29,433	29,358	28,632
XI	Isokinetic Sampling Rate, Percent		102.4	102.4	102.5

* 68 Degrees F -- 29.92 Inches of Mercury (Hg)

(continued next page)

		1	2	3
		----	----	----
<u>Method 5 Results:</u>				
mg	Catch, Milligrams	9.5	9.0	8.6
gr/DSCF	Concentration, Grains per DSCF*	0.002409	0.002289	0.002269
Lb/Hr	Emission Rate, Lbs/Hour (PMRc)	0.4482	0.4247	0.4052

* 68 Degrees F -- 29.92 Inches of Mercury (Hg)

Rotary Dryer System Stack

VOLUME OF DRY GAS SAMPLED AT STANDARD CONDITIONS

$$V_m(\text{std}) = 17.64 * Y * V_m * \frac{(P_{\text{bar}} + \Delta H/13.6)}{(460 + t_m)}$$

$$V_m(\text{std}) = 17.64 * 1.010 * 61.356 * \frac{(29.80 + 2.877/13.6)}{(460 + 79)} = 60.866 \text{ DSCF}$$

VOLUME OF WATER VAPOR AT STANDARD CONDITIONS

$$V_w(\text{std}) = 0.04707 * V_{1c}$$

$$V_w(\text{std}) = 0.04707 * 174.0 = 8.190 \text{ SCF}$$

PERCENT MOISTURE, BY VOLUME, AS MEASURED IN FLUE GAS

$$\%H_2O = 100 * V_w(\text{std}) / (V_w(\text{std}) + V_m(\text{std}))$$

$$\%H_2O = \frac{8.190}{8.190 + 60.866} * 100 = 11.9 \%$$

DRY MOLE FRACTION OF FLUE GAS

$$M_{fd} = 1 - \%H_2O/100$$

$$M_{fd} = 1 - 11.9/100 = 0.881$$

DRY MOLECULAR WEIGHT OF FLUE GAS

$$M_d = \%CO_2 * 0.44 + \%O_2 * 0.32 + \%CO+N_2 * 0.28$$

$$M_d = 3.1*0.44 + 16.7*0.32 + 80.2*0.28 = 29.16 \text{ LB/LB-MOLE}$$

WET MOLECULAR WEIGHT OF FLUE GAS

$$M_s = (M_d * M_{fd}) + (0.18 * \%H_2O)$$

$$M_s = 29.16 * 0.881 + (0.18 * 11.9) = 27.84 \text{ LB/LB-MOLE}$$

ABSOLUTE FLUE GAS PRESSURE

$$P_s = P_{bar} + P_g / 13.6$$

$$P_s = 29.80 + (-0.1 / 13.6) = 29.79 \text{ IN. HG.}$$

AVERAGE FLUE GAS VELOCITY [Note: (Delta p)avg is square of avg sq. root]

$$v_s = 85.49 * C_p * \text{SQRT} \left[\frac{(\Delta p)_{avg} * (460 + t_s)}{P_s * M_s} \right]$$

$$v_s = 85.49 * 0.840 * \text{SQRT} \left[\frac{0.4280 * (460 + 168)}{29.79 * 27.84} \right] = 40.9 \text{ FT/SEC}$$

DRY VOLUMETRIC FLUE GAS FLOW RATE @ STANDARD CONDITIONS

$$Q_{sd} = \frac{60}{144} * M_{fd} * v_s * A * \frac{T_{std}}{t_s + 460} * \frac{P_s}{P_{std}}$$

$$Q_{sd} = \frac{60}{144} * 0.881 * 40.9 * 1,728.0 * \frac{528}{168 + 460} * \frac{29.79}{29.92}$$

$$Q_{sd} = 21,710 \text{ SCFM}$$

WET VOLUMETRIC STACK GAS FLOW RATE @ FLUE GAS CONDITIONS

$$Q_{aw} = 60 / 144 * v_s * A$$

$$Q_{aw} = 60 / 144 * 40.9 * 1,728.0 = 29,433 \text{ ACFM}$$

PERCENT ISOKINETIC OF SAMPLING RATE

$$\%I = \frac{P_{std}}{T_{std}} * \frac{100}{60} * \frac{(t_s + 460) * V_m(std)}{P_s * v_s * M_{fd} * \theta * \text{Area-nozzle, sq.ft.}}$$

$$\%I = \frac{29.92}{528} * \frac{100}{60} * \frac{(168 + 460) * 60.866}{29.79 * 40.9 * 0.881 * 63.00 * 0.0005208}$$

$$\%I = 102.4 \%$$

GRAINS PER DRY STANDARD CUBIC FOOT

$$\text{gr/DSCF} = \frac{7000}{453,592} * \frac{\text{mgs}}{V_m(\text{std})}$$

$$\text{gr/DSCF} = \frac{7000}{453,592} * \frac{9.5}{60.866} = 0.0024 \text{ gr/DSCF}$$

POUNDS PER HOUR

$$\text{Lb/Hr} = 60 / 7000 * \text{gr/DSCF} * Q_{sd}$$

$$\text{Lb/Hr} = 60/7000 * 0.0024 * 21,710 = 0.45 \text{ LB/HR}$$

B. FIELD AND ANALYTICAL DATA

1. Particulate

Preliminary Field Data

PLANT NAME ALLIANCE CONTRACTING CORP.
 LOCATION DURHAM, NC
 SAMPLING LOCATION BAGHOUSE OUTLET STACK
 DUCT DEPTH
 FROM INSIDE FAR WALL TO OUTSIDE OF PORT 50"
 NIPPLE LENGTH 2"
 DEPTH OF DUCT 48
 WIDTH (RECTANGULAR DUCT) 36
 EQUIVALENT DIAMETER:

$$D_E = \frac{2 \times \text{DEPTH} \times \text{WIDTH}}{\text{DEPTH} + \text{WIDTH}} = \frac{2(48)(36)}{(48 + 36)} = 41.14$$

 DISTANCE FROM
 PORTS TO NEAREST UPSTREAM DOWNSTREAM
 FLOW DISTURBANCE 21' 5'
 DIAMETERS 6.15 1.46
 STACK AREA = 48" X 36" = 1728 in²

DRAW HORIZONTAL LINE THROUGH DIAMETERS

If more than 8 and 2 diameters and if duct dia. is less than 24", use 8 or 9 points.

VELOCITY	DIAMETERS UP	DIAMETERS DOWN	PARTICULATE
12	8	2.0	12
	7	1.75	16
	6	1.5	20
16	5	1.25	24 or 25
	2	0.5	

Point	% OF DUCT DEPTH	DISTANCE FROM INSIDE WALL	DISTANCE FROM OUTSIDE OF PORT
1	8.3	4"	6"
2	25.0	12	14
3	41.7	20	22
4	58.3	28	30
5	75.0	36	38
6	91.7	44	46
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			

LOCATION OF TRAVERSE POINTS IN CIRCULAR STACKS

	4	6	8	10	12	14	16	18	20	22	24
1	6.7	4.4	3.2	2.6	2.1	1.8	1.6	1.4	1.3	1.1	1.1
2	25.0	14.6	10.5	8.2	6.7	5.7	4.9	4.4	3.9	3.5	3.2
3	75.0	29.6	19.4	14.6	11.8	9.9	8.5	7.5	6.7	6.0	5.5
4	93.3	70.4	32.3	22.6	17.7	14.6	12.5	10.9	9.7	8.7	7.9
5		85.4	67.7	34.2	25.0	20.1	16.9	14.6	12.9	11.6	10.5
6		95.6	80.6	65.8	35.6	26.9	22.0	18.8	16.5	14.6	13.2
7			89.5	77.4	64.4	36.6	28.3	23.6	20.4	18.0	16.1
8			96.8	85.4	75.0	63.4	37.5	29.6	25.0	21.8	19.4
9				91.8	82.3	73.1	62.5	38.2	30.6	26.2	23.0
10				97.4	88.2	79.9	71.7	61.8	38.8	31.5	27.2
11					93.3	85.4	78.0	70.4	61.2	39.3	32.3
12					97.9	90.1	83.1	76.4	69.4	60.7	39.8
13						94.3	87.5	81.2	75.0	68.5	60.2
14						98.2	91.5	85.4	79.6	73.8	67.7
15							95.1	89.1	83.5	78.2	72.8
16							98.4	92.5	87.1	82.0	77.0
17								95.6	90.3	85.4	80.6
18								98.6	93.3	88.4	83.9
19									96.1	91.3	86.8
20									98.7	94.0	89.5
21										96.5	92.1
22										98.9	94.5
23											96.8
24											98.9

LOCATION OF TRAVERSE POINTS IN RECTANGULAR STACKS

	2	3	4	5	6	7	8	9	10	11	12
1	25.0	16.7	12.5	10.0	8.3	7.1	6.3	5.6	5.0	4.5	4.2
2	75.0	50.0	37.5	30.0	25.0	21.4	18.8	16.7	15.0	13.6	12.5
3		83.3	62.5	50.0	41.7	35.7	31.3	27.8	25.0	22.7	20.8
4			87.5	70.0	58.3	50.0	43.8	38.9	35.0	31.8	29.2
5				90.0	75.0	64.3	56.3	50.0	45.0	40.9	37.5
6					91.7	78.6	68.8	61.1	55.0	50.0	45.8
7						92.9	81.3	72.2	65.0	59.1	54.2
8							93.8	83.3	75.0	68.2	62.5
9								94.4	85.0	77.3	70.8
10									95.0	86.4	79.2
11										95.5	87.5
12											95.8

Plant Name Alliance Construction Contracting
 Sampling Location Baghouse stack Fuel Type _____

Run and/or Sample No. 3 Leak Test? ☒ Date 5/26/88 Operator WSN

Time of Sample Collection	Time of Analysis	CO ₂ Reading A	O ₂ Reading B	CO Reading C	%O ₂ B-A	%CO C-B	%N ₂ 100-C
11:05	15:50	3.1	19.8	—	16.7	—	
—	—	3.1	19.8	—	16.7	—	
12:20	16:05	3.0	19.8	—	16.8	—	
Avg.		3.1	Avg.		16.7	—	80.2

Run and/or Sample No. _____ Leak Test? _____ Date _____ Operator _____

Time of Sample Collection	Time of Analysis	CO ₂ Reading A	O ₂ Reading B	CO Reading C	%O ₂ B-A	%CO C-B	%N ₂ 100-C
Avg.			Avg.				

Run and/or Sample No. _____ Leak Test? _____ Date _____ Operator _____

Time of Sample Collection	Time of Analysis	CO ₂ Reading A	O ₂ Reading B	CO Reading C	%O ₂ B-A	%CO C-B	%N ₂ 100-C
Avg.			Avg.				

- 11

[illegible]

ENTBODY

PARTICULATE FIELD DATA

COMPANY NAME <u>Alliance Constr. Corp.</u>		RUN NUMBER <u>3</u>	
ADDRESS <u>Durham, NC</u>		TIME START <u>11:05</u>	
SAMPLING LOCATION <u>Raghuire Stn.</u>		TIME FINISH <u>12:20</u>	
DATE <u>5/26/88</u>	TEAM LEADER <u>WSN</u>	TECHNICIANS <u>JWM</u>	
BAROMETRIC PRESSURE, IN. HG <u>29.8</u>		STATIC PRESSURE, IN. H ₂ O <u>-0.14</u>	
SAMPLING TRAIN LEAK TEST VACUUM, IN. HG <u>15</u>			
SAMPLING TRAIN LEAK RATE, CU. FT./MIN. <u>0.005</u> <u>0.000</u>			

<u>EQUIPMENT CHECKS</u>	<u>IDENTIFICATION NUMBERS</u>
<input checked="" type="checkbox"/> PITOTS, PRE-TEST	REAGENT BOX <u>241</u> NOZZLE <u>407</u> DIAMETER <u>.309</u>
<input checked="" type="checkbox"/> PITOTS, POST-TEST	METER BOX <u>N.8</u> T/C READOUT <u>F.6</u>
<input checked="" type="checkbox"/> GREAT SAMPLING SYSTEM	UMBILICAL <u>U.50</u> T/C PROBE <u>6.1</u>
<input checked="" type="checkbox"/> TEDLAR BAG	SAMPLE BOX <u>33</u> GREAT PUMP <u>4</u>
<input checked="" type="checkbox"/> THERMOCOUPLE @ <u>172</u> OF	PROBE <u>5.11</u> TEDLAR BAG <u>21</u>

<u>FILTER #</u>	<u>TARE</u>	<u>NOMOGRAPH SET-UP</u>	<u>NOMOGRAPH #</u>
<u>E 7167</u>	<u>.4872</u>	ΔH_g <u>1.69</u>	<u>WSN</u>
<u> </u>	<u> </u>	METER TEMP <u>90</u>	C FACTOR <u>0.83</u>
<u> </u>	<u> </u>	% MOISTURE <u>13</u>	STACK TEMP <u>163</u>
<u> </u>	<u> </u>		REF. ΔP <u>0.28</u>

[illegible]

PARTICULATE SAMPLING LABORATORY RESULTS

Plant Name: ALLIANCE

EEI Ref# 5911

Sampling Location: Baghouse Stack

Date Received: 5/27 Date Analyzed: 5/31 Reagent Box(es): 0241

Run Number	1	2	3
Run Date	5/26	5/26	5/26
Sample ID/Container #	F&R 2083 *****	F&R 2103 *****	F&R 2137 *****
	97.6424	97.7653	98.7799
	97.6428	97.7655	98.7799
Tare Weight., g.	97.1426 *****	97.2641 *****	98.2837 *****
SAMPLE WT., g.	0.4998	0.5012	0.4962
Sample ID/Container #	*****	*****	*****
	0.0000	0.0000	0.0000
Tare Wt., g.	*****	*****	*****
SAMPLE WT., g.	0.0000	0.0000	0.0000
Sum of Particulate, mg.	499.8	501.2	496.2
Total Filter Tare, mg.	489.9	491.8	487.2
Blank Residue, mg. (200 ml)	0.4 (175 ml)	0.4 (200 ml)	0.4
TOTAL PARTICULATE CATCH, mg.	9.5	9.0	8.6

Blank Beaker # 2003
 Final wt., mg. 99546.3
 Tare wt., mg. 99545.9
 Residue, mg. 0.4
 Volume, ml. 200

---Legend---
 = Final Weight
 L = Loose Particulate
 F = Filter D = Dish
 R = Rinse P = Pan

Notes and Comments

Concentration, mg/ml 0.002

ENTROPY

MOISTURE SAMPLING LABORATORY RESULTS

Plant Name: ALLIANCE

EEI Ref# 5911

Sampling Location: Baghouse Stack

Date Received: 5/27 Date Analyzed: 5/27 Reagent Box(es): 0241

Run Number	1	2	3
Run Date	5/26	5/26	5/26

ANALYSIS OF MOISTURE CATCH

Reagent 1 (H2O)			
Final Weight, g.	350.0	337.0	340.0
Tared Weight, g.	200.0	200.0	200.0
	=====	=====	=====
Water Catch, g.	150.0	137.0	140.0
Reagent 2 ()			
Final Weight, g.			
Tared Weight, g.			
	=====	=====	=====
Water Catch, g.	0.0	0.0	0.0
Reagent 3 ()			
Final Weight, g.			
Tared Weight, g.			
	=====	=====	=====
Water Catch, g.	0.0	0.0	0.0
CONDENSED WATER, g.	150.0	137.0	140.0
Silica Gel:			
Final Weight, g.	224.0	232.0	232.5
Tared Weight, g.	200.0	200.0	200.0
	=====	=====	=====
ADSORBED WATER, g.	24.0	32.0	32.5
TOTAL WATER COLLECTED, g.	174.0	169.0	172.5

CUSTODY SHEET FOR REAGENT BOX # 0241

Date of Makeup 5/12 Initials MSJ Locked? ☒
 Individual Tare of Reagent: 200 mls. of H₂O
 Individual Tare of Reagent: _____ mls. of _____
 Individual Silica Gel Tare Weight 200 gms.

PLANT NAME Alliance Construction
 SAMPLING LOCATION DAGHOOSE STACK

Run Number	Date Used	Initials	Locked?	Date Cleanup	% S. Gel Spent	Initials	Locked?
1	5/26/88	WSN	✓	5/26/88	.70	WSN	✓
2	5/26/88	WSN	✓	5/26/88	.70	WSN	✓
3	5/26/88	WSN	✓	5/26/88	.70	WSN	✓

Received in Lab Date 5/27 Initials SAW Locked? ☒

Sampling Method: M-5

Zero & Span Balance
Initials ✓

Filter #	Tare Weight (grams)	Used on Test
----------	---------------------	--------------

Remarks:

<u>E6958</u>	<u>.4899</u>	<u>1</u>
<u>E6994</u>	<u>.4918</u>	<u>2</u>
<u>E7176</u>	<u>.4872</u>	<u>3</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

APPENDIX B.2

B. FIELD AND ANALYTICAL DATA

2. Plume Opacity

ENTROPY

VISIBLE EMISSIONS EVALUATOR

This is to certify that

Paul Minor

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

Thomas H. Rose
President

Willie S. Lee
Vice President

David Savage
Program Manager

219467
Certificate Number

Orlando
Location

March 9, 1988
Date of Issue

VISIBLE EMISSION OBSERVATION FORM

No. 002

1981 3 - 19

COMPANY NAME <u>Alliance Construction Corp</u>		
STREET ADDRESS <u>Plum Ave</u>		
CITY <u>Durham</u>	STATE <u>N.C.</u>	ZIP
PHONE (KEY CONTACT)		SOURCE ID NUMBER

PROCESS EQUIPMENT <u>Asphalt Rotary Kila</u>	OPERATING MODE <u>Running</u>
CONTROL EQUIPMENT <u>Bag house</u>	OPERATING MODE <u>Running</u>

DESCRIBE EMISSION POINT <u>3'x4' Baghouse stack</u>	
HEIGHT ABOVE GROUND LEVEL <u>28'</u>	HEIGHT RELATIVE TO OBSERVER Start <u>23'</u> End <u>23'</u>
DISTANCE FROM OBSERVER Start <u>180'</u> End <u>180'</u>	DIRECTION FROM OBSERVER Start <u>NW</u> End <u>NW</u>

DESCRIBE EMISSIONS Start <u>No visible Emissions</u> End	
EMISSION COLOR Start <u>No visible Emissions</u> End <u>No visible Emissions</u>	IF WATER DROPLET PLUME Attached <input type="checkbox"/> Detached <input checked="" type="checkbox"/>
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED Start <u>1' Above stack opening</u> End <u>1' Above stack opening</u>	

PLUME BACKGROUND Start <u>Clear Sky</u> End <u>Clear Sky</u>	
BACKGROUND COLOR Start <u>Blue Sky</u> End <u>Blue Sky</u>	SKY CONDITIONS Start <u>Clear</u> End <u>Clear</u>
WIND SPEED Start <u>3-5</u> End <u>3-5 mph</u>	WIND DIRECTION Start <u>N</u> End <u>N</u>
AMBIENT TEMP Start <u>52°F</u> End <u>53°F</u>	WET BULB TEMP <u>44°F</u>
RH. percent	

Stack with Plume Sun Wind	SOURCE LAYOUT SKETCH
---------------------------------	--------------------------

ADDITIONAL INFORMATION <u>Visible emissions Light brown</u>	
<u>when seen Slant Angle 70°</u>	

OBSERVATION DATE 5-26-88				START TIME 09 29	END TIME 0959
SEC MIN	0	15	30	45	COMMENTS
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	5	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	
20	0	0	0	5	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	5	0	0	
29	0	0	0	0	
30	0	0	0	0	

OBSERVER'S NAME (PRINT) <u>Paul A. Minor</u>	
OBSERVER'S SIGNATURE <u>Paul Minor</u>	DATE <u>5-26-88</u>
ORGANIZATION <u>Eastern Technical Assoc.</u>	
CERTIFIED BY <u>Eastern Technical Associate</u>	DATE <u>3-9-88</u>

CONTINUED ON VEO FORM NUMBER	<u>003</u>
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VISIBLE EMISSION OBSERVATION FORM

Test - 1 - 18
No. 001

COMPANY NAME <i>Alliance Construction Corp</i>		
STREET ADDRESS <i>Plum Ave</i>		
CITY <i>Durham</i>	STATE <i>N.C.</i>	ZIP
PHONE (KEY CONTACT)		SOURCE ID NUMBER

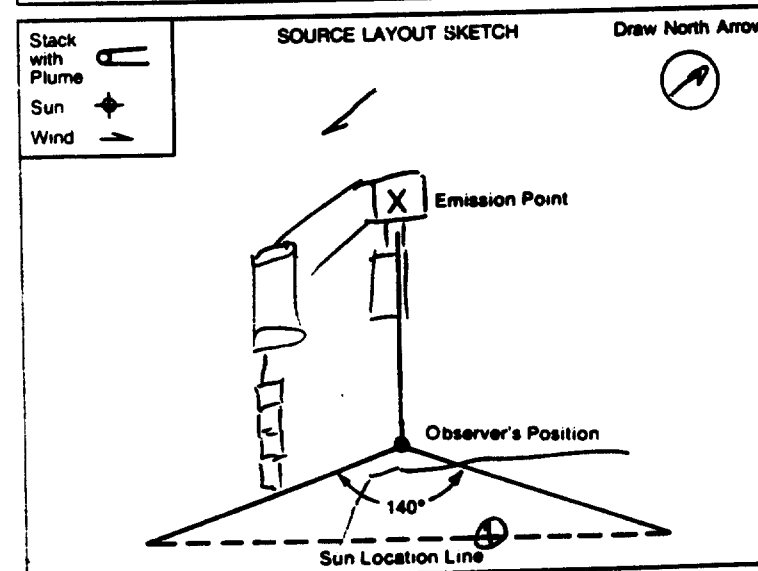
OBSERVATION DATE			START TIME		END TIME
5-26-88			0759		0928
SEC	0	15	30	45	COMMENTS
MIN					
1	0	0	0	0	
2	5	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

PROCESS EQUIPMENT <i>Asphalt kiln</i>	OPERATING MODE <i>Running</i>
CONTROL EQUIPMENT <i>Bag house</i>	OPERATING MODE <i>Running</i>

DESCRIBE EMISSION POINT <i>Bag house stack 4' x 3'</i>	
HEIGHT ABOVE GROUND LEVEL <i>23'</i>	HEIGHT RELATIVE TO OBSERVER Start <i>23'</i> End <i>23'</i>
DISTANCE FROM OBSERVER Start <i>180'</i> End <i>180'</i>	DIRECTION FROM OBSERVER Start <i>NW</i> End <i>NW</i>

DESCRIBE EMISSIONS Start <i>No visible emissions</i> End <i>No visible emissions</i>	
EMISSION COLOR Start <i>—</i> End <i>—</i>	IF WATER DROPLET PLUME Attached <input type="checkbox"/> Detached <input checked="" type="checkbox"/>
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED Start <i>1' Above stack</i> End <i>1' Above stack</i>	

DESCRIBE PLUME BACKGROUND Start <i>Blue sky</i> End <i>Blue sky</i>	
BACKGROUND COLOR Start <i>Blue</i> End <i>Blue</i>	SKY CONDITIONS Start <i>Clear</i> End <i>Clear</i>
WIND SPEED <i>mph</i> Start <i>4-7</i> End <i>4-7</i>	WIND DIRECTION Start <i>N</i> End <i>N</i>
AMBIENT TEMP Start <i>50°F</i> End <i>51°F</i>	WET BULB TEMP <i>43°F</i>
RH, percent	



ADDITIONAL INFORMATION <i>Slant Angle 7°</i>

OBSERVER'S NAME (PRINT) <i>Paul Anthony Minor</i>	DATE <i>5-26-88</i>
OBSERVER'S SIGNATURE <i>Paul Minor</i>	
ORGANIZATION <i>Eastern Technical Associates</i>	
CERTIFIED BY <i>Eastern Technical Assoc</i>	DATE <i>3/9/88</i>
CONTINUED ON VEO FORM NUMBER	<i>002</i>



EVALUATOR

Penelope WidenEVALUATION DATE 5-6-93B

METHOD 5: SECONDARY EMISSIONS TEST REPORT EVALUATION

AGENCY: NC FACILITY: Alliance Contracting Corp. TEST DATE: 5-26-88

PROCESS TESTED (SCC): _____ control device → No Spec's Avail.

Rotary Dryer Stack, Baghouse → Stack → Atmosphere

TEST RESULTS/PROCESS RATES/EMISSION FACTOR RATINGS:

	Emission Rate (lb/hr)	Emission Factor (lb/Hen)
1	0.4482	0.00256
2	0.4247	0.00243
3	0.4052	0.00232
Avg	0.4260	0.00243

PROCESS RATE

is process rate during testing
representative of normal operations3175 tph

BACK-HALF

if any, what method was used to
catch and recover condensable matterN/AFilterable only

FLOW/STREAM ANALYSIS

Methods 1-4 or equivalent (including traverse
and port illustrations, cyclonic flow
determination, MW and moisture calculations)
performed to allow calculation of emission
rates at standard conditions3

1	✓	3 ports	6 pts/port
2	✓	VH, SPV, APV, TV, MW, A	
3	✓	CO ₂ , O ₂	✓
4	✓		

FIELD DATA

is field data on standard forms, and
does raw data correspond with printout3

SAMPLING DURATION

must have at least 3 runs, each ≥ 1 hour ✓
duration, with sampling ≥ 2 minutes at each
traverse point, and total sampling volume ≥ 30 dscf ✓33.5 min / pt.

SAMPLING TEMPERATURE

both probe and filter must be maintained at
248 ± 25°F or other temperature specified in NSPS3

ISOKINETICS

within 100±10% for all runs

3

EQUIPMENT

borosilicate glass probe liner, quartz fiber filter

2CALIBRATION were both pre- and
post-test calibrations performed for
meter box✓ ✓3

pitot tube

3

temperature sensor

3

nozzle (3 #)

3

LEAK CHECKS

pretest optional; post-test, conducted at vacuum
≥ highest sampling vacuum, leakage rate < 0.02 cfm
or 4% of average sampling rate3

BLANKS

acetone blank analyzed, < 0.001% residue

3
$$0.002 \frac{mg}{m^3} \times \frac{cm^3}{m^3} \times \frac{10^6 m^3}{10^6 m^3} \times \frac{1}{1000} = 2.53 \times 10^{-6}$$

SAMPLE PREP

filter desiccation and tare weights documented

3

VISIBLE EMISSION OBSERVATION FORM

125T
No. 003

20

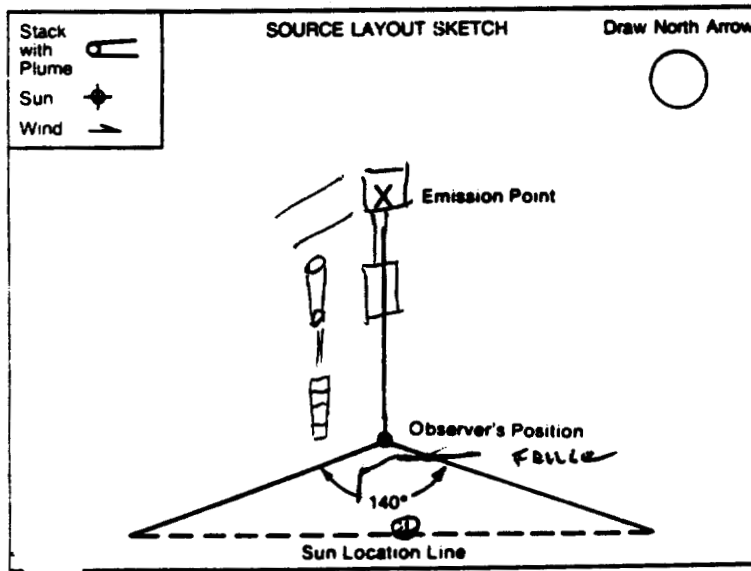
COMPANY NAME <i>Alliance Construction Corp</i>		
STREET ADDRESS		
CITY <i>Durham</i>	STATE <i>N.C.</i>	ZIP
PHONE (KEY CONTACT)		SOURCE ID NUMBER

PROCESS EQUIPMENT <i>Rotary Kiln</i>	OPERATING MODE <i>Running</i>
CONTROL EQUIPMENT <i>Bag house</i>	OPERATING MODE <i>Running</i>

DESCRIBE EMISSION POINT <i>Bag house stack 4' x 3'</i>	
HEIGHT ABOVE GROUND LEVEL <i>28'</i>	HEIGHT RELATIVE TO OBSERVER Start <i>23'</i> End <i>23'</i>
DISTANCE FROM OBSERVER Start <i>180'</i> End <i>180'</i>	DIRECTION FROM OBSERVER Start <i>NW</i> End <i>NW</i>

DESCRIBE EMISSIONS Start <i>NO visible Emissions</i> End <i>NO visible emissions</i>	
EMISSION COLOR Start <i>NONE</i> End <i>NONE</i>	IF WATER DROPLET PLUME Attached <input type="checkbox"/> Detached <input checked="" type="checkbox"/>
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED S: <i>1' Above stack</i> End <i>1' Above stack</i>	

RIBE PLUME BACKGROUND Start <i>Clear Sky</i> End <i>Clear Sky</i>	
BACKGROUND COLOR Start <i>Blue</i> End <i>Blue</i>	SKY CONDITIONS Start <i>Clear</i> End <i>Clear</i>
WIND SPEED Start <i>3-5 mph</i> End <i>3-5 mph</i>	WIND DIRECTION Start <i>N</i> End <i>N</i>
AMBIENT TEMP Start <i>54°F</i> End <i>54°F</i>	WET BULB TEMP <i>49°F</i>
RH, percent	



ADDITIONAL INFORMATION
<i>Slant Angle 7°</i>

OBSERVATION DATE <i>5-26-88</i>					START TIME <i>0859</i>	END TIME <i>0905</i>
SEC	0	15	30	45	COMMENTS	
1	0	0	0	0		
2	0	0	0	0		
3	0	0	0	0		
4	0	0	0	0		
5	0	0	0	0		
6	0	0	0	0		
7	0	0			<i>End of Test</i>	
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						

OBSERVER'S NAME (PRINT) <i>Paul A. Minor</i>	
OBSERVER'S SIGNATURE <i>Paul Minor</i>	DATE <i>5-26-88</i>
ORGANIZATION <i>Eastern Technical Associates</i>	
CERTIFIED BY <i>Eastern Technical Associates</i>	DATE <i>5-26-88</i>

CONTINUED ON VEO FORM NUMBER				
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VISIBLE EMISSION OBSERVATION FORM

Test 2 - 21
No. 004

COMPANY NAME <i>Alliance Construction Corp</i>		
STREET ADDRESS <i>311 Plum St.</i>		
CITY <i>Durham</i>	STATE <i>N.C.</i>	ZIP
PHONE (KEY CONTACT)		SOURCE ID NUMBER

PROCESS EQUIPMENT <i>Rotary Kiln</i>	OPERATING MODE <i>Running</i>
CONTROL EQUIPMENT <i>Bag house</i>	OPERATING MODE <i>Running</i>

DESCRIBE EMISSION POINT <i>3' x 4' Bag house stack</i>	
HEIGHT ABOVE GROUND LEVEL <i>28'</i>	HEIGHT RELATIVE TO OBSERVER Start <i>23'</i> End <i>23'</i>
DISTANCE FROM OBSERVER Start <i>180'</i> End <i>180'</i>	DIRECTION FROM OBSERVER Start <i>NW</i> End <i>NW</i>

DESCRIBE EMISSIONS	
Start <i>NO Visible Emission</i>	End <i>No visible emissions</i>
EMISSION COLOR	IF WATER DROPLET PLUME
Start <i>None</i> End	Attached () Detached ()
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED	
Start <i>3' Above stack opening</i>	End <i>3' Above stack opening</i>

DESCRIBE PLUME BACKGROUND	
Start <i>Clear sky</i>	End <i>Clear sky</i>
BACKGROUND COLOR	SKY CONDITIONS
Start <i>Blue</i> End <i>Blue</i>	Start <i>Clear</i> End <i>Clear</i>
WIND SPEED	WIND DIRECTION
Start <i>3-5 mph</i> End <i>3-5 mph</i>	Start <i>N</i> End <i>N</i>
AMBIENT TEMP	WET BULB TEMP
Start <i>56°F</i> End <i>57°F</i>	<i>49°F</i>
RH, percent	

Stack with Plume	Sun	Wind
SOURCE LAYOUT SKETCH		
Draw North Arrow		

ADDITIONAL INFORMATION

OBSERVATION DATE <i>5-26-88</i>					START TIME <i>0930</i>	END TIME <i>1000</i>
SEC	0	15	30	45	COMMENTS	
MIN						
1	0	0	0	0		
2	0	0	0	0		
3	0	0	0	0		
4	0	0	0	0		
5	0	0	0	0		
6	0	0	0	0		
7	0	0	0	0		
8	0	0	0	0		
9	0	0	0	0		
10	0	0	0	0		
11	0	0	0	0		
12	0	0	0	0		
13	0	0	0	0		
14	0	0	0	0		
15	0	0	0	0		
16	0	0	0	0		
17	0	0	0	0		
18	0	0	0	0		
19	5	0	0	0		
20	0	0	0	0		
21	0	0	0	0		
22	0	0	0	0		
23	0	0	0	0		
24	0	0	0	0		
25	0	0	0	0		
26	0	0	0	0		
27	0	0	0	0		
28	0	0	0	0		
29	0	0	0	0		
30	0	0	0	0		

OBSERVER'S NAME (PRINT) <i>Paul A. Minor</i>	
OBSERVER'S SIGNATURE <i>Paul Minor</i>	DATE <i>5-26-88</i>
ORGANIZATION <i>Eastern Technical Associates</i>	
CERTIFIED BY <i>Eastern Technical Assoc.</i>	DATE <i>3-9-88</i>

CONTINUED ON VEO FORM NUMBER	<i>005</i>
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VISIBLE EMISSION OBSERVATION FORM

Test # 2 - 23
No. 006

COMPANY NAME <i>Alliance Construction Corp</i>		
STREET ADDRESS <i>311 Plum St</i>		
CITY <i>Durham</i>	STATE <i>N.C.</i>	ZIP
PHONE (KEY CONTACT)	SOURCE ID NUMBER	

PROCESS EQUIPMENT <i>Rotary Kiln</i>	OPERATING MODE <i>Running</i>
CONTROL EQUIPMENT <i>Bag house</i>	OPERATING MODE <i>Running</i>

DESCRIBE EMISSION POINT
3' x 4' Bag house stack

HEIGHT ABOVE GROUND LEVEL <i>28'</i>	HEIGHT RELATIVE TO OBSERVER Start <i>20'</i> End <i>20'</i>
DISTANCE FROM OBSERVER Start <i>180'</i> End <i>180'</i>	DIRECTION FROM OBSERVER Start <i>NW</i> End <i>NW</i>

DESCRIBE EMISSIONS
Start *NO visible emissions* End *NO visible emissions*

EMISSION COLOR
Start *None* End *None* Attached ☐ Detached ☐

POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED
Start *3' Above stack opening* End *3' Above stack opening*

DESCRIBE PLUME BACKGROUND Start <i>Blue sky</i> End <i>Blue sky</i>	
BACKGROUND COLOR Start <i>Blue</i> End <i>Blue</i>	SKY CONDITIONS Start <i>Clear</i> End <i>Clear</i>
WIND SPEED Start <i>3-5 mph</i> End <i>3-5 mph</i>	WIND DIRECTION Start <i>NE</i> End <i>NE</i>
AMBIENT TEMP Start <i>59°F</i> End <i>59°F</i>	WET BULB TEMP <i>46°F</i>
	RH, percent

SOURCE LAYOUT SKETCH

Draw North Arrow

ADDITIONAL INFORMATION
40° Slant Angle

OBSERVATION DATE <i>5-26-88</i>		START TIME <i>10:30</i>		END TIME <i>1038</i>	
SEC MIN	0	15	30	45	COMMENTS
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0				<i>End of Test</i>
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					

OBSERVER'S NAME (PRINT) <i>Paul A. Minor</i>	
OBSERVER'S SIGNATURE <i>Paul Minor</i>	DATE <i>5-26-88</i>
ORGANIZATION <i>Eastern Technical Associates</i>	
CERTIFIED BY <i>Eastern Technical Associates</i>	DATE <i>3-9-88</i>
CONTINUED ON VEO FORM NUMBER	

VISIBLE EMISSION OBSERVATION FORM

Test # 3 - 24
No. 007

COMPANY NAME <i>Alliance Construction Corp</i>		
STREET ADDRESS <i>311 Plum st.</i>		
CITY <i>Durham</i>	STATE <i>NC.</i>	ZIP
PHONE (KEY CONTACT)		SOURCE ID NUMBER

PROCESS EQUIPMENT <i>Rotary Kiln</i>	OPERATING MODE <i>Running</i>
CONTROL EQUIPMENT <i>Bag house</i>	OPERATING MODE <i>Running</i>

DESCRIBE EMISSION POINT
3' x 4' Bag house stack

HEIGHT ABOVE GROUND LEVEL <i>28'</i>	HEIGHT RELATIVE TO OBSERVER Start <i>20'</i> End <i>20'</i>
DISTANCE FROM OBSERVER Start <i>180'</i> End <i>180'</i>	DIRECTION FROM OBSERVER Start <i>NW</i> End <i>NW</i>

DESCRIBE EMISSIONS

Start *NONE* End *NONE*

EMISSION COLOR
Start *NONE* End *NONE*

IF WATER DROPLET PLUME *NO*
Attached ☐ Detached ☐

POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED
3' Above stack opening End *3' Above stack opening*

DESCRIBE PLUME BACKGROUND

Start *Clear sky* End *Clear sky*

BACKGROUND COLOR
Start *Blue* End *Blue*

SKY CONDITIONS
Start *clear* End *clear*

WIND SPEED
Start *4-7* End *3-5*


WIND DIRECTION
Start *NE* End *NE*


AMBIENT TEMP
Start *62°F* End


WET BULB TEMP
54°F


RH. percent


SOURCE LAYOUT SKETCH


Stack with Plume 


Sun 

Wind 

Draw North Arrow 

Emission Point 

Observer's Position 

Sun Location Line 

140°

ADDITIONAL INFORMATION

4° joint Angle

OBSERVATION DATE <i>5-26-88</i>				START TIME <i>1103</i>	END TIME <i>1133</i>
SEC MIN	0	15	30	45	COMMENTS
1	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
2	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
3	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
4	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
5	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
6	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
7	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
8	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
9	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
10	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
11	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
12	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
13	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
14	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
15	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
16	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
17	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
18	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
19	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
20	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
21	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
22	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
23	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
24	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
25	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
26	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
27	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
28	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
29	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
30	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	

OBSERVER'S NAME (PRINT) <i>Paul A. Minor</i>	
OBSERVER'S SIGNATURE <i>Paul Minor</i>	DATE <i>5-26-88</i>
ORGANIZATION <i>Eastern technical Associates</i>	
CERTIFIED BY <i>Eastern Technical Associates</i>	DATE <i>3-9-88</i>

CONTINUED ON VEO FORM NUMBER

008

VISIBLE EMISSION OBSERVATION FORM

1251 25
No. 008

COMPANY NAME <i>Alliance Construction Corp.</i>		
STREET ADDRESS <i>311 Plum St.</i>		
CITY <i>Durham</i>	STATE <i>N.C.</i>	ZIP
PHONE (KEY CONTACT)		SOURCE ID NUMBER

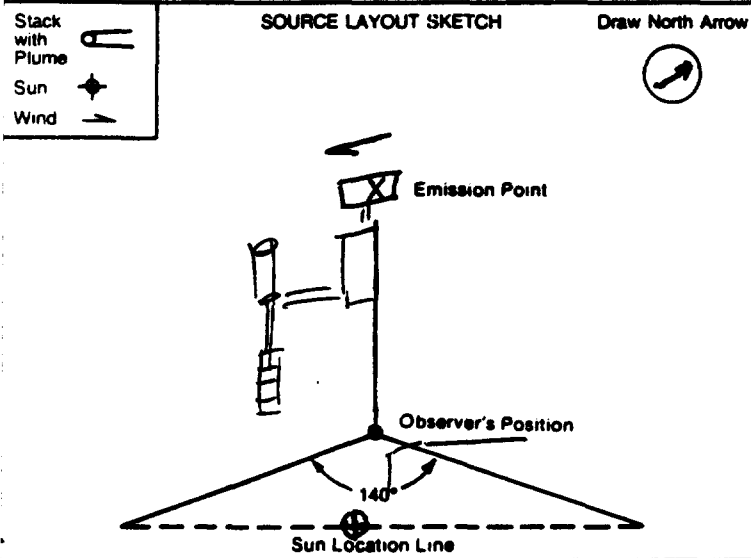
PROCESS EQUIPMENT <i>Rotary Kiln Asphalt</i>	OPERATING MODE <i>Running</i>
CONTROL EQUIPMENT <i>Bag house</i>	OPERATING MODE <i>Running</i>

DESCRIBE EMISSION POINT
3' x 4' Bag house stack

HEIGHT ABOVE GROUND LEVEL <i>28'</i>	HEIGHT RELATIVE TO OBSERVER Start <i>20'</i> End <i>20'</i>
DISTANCE FROM OBSERVER Start <i>180'</i> End <i>180'</i>	DIRECTION FROM OBSERVER Start <i>NW</i> End <i>NW</i>

DESCRIBE EMISSIONS	
Start <i>NONE</i>	End <i>NONE</i>
EMISSION COLOR	
Start <i>NONE</i>	End <i>NONE</i>
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED	
S <i>3' Above Stack opening</i> End <i>3' Above Stack opening</i>	

RIBE PLUME BACKGROUND	
Start <i>Clear sky</i>	End <i>Clear sky</i>
BACKGROUND COLOR	
Start <i>Blue</i>	End <i>Blue</i>
WIND SPEED	
Start <i>4-7 mph</i>	End <i>4-7</i>
WIND DIRECTION	
Start <i>NE</i>	End <i>NE</i>
AMBIENT TEMP	
Start <i>64°F</i>	End <i>65°F</i>
WET BULB TEMP	
<i>58°F</i>	
RH, percent	



ADDITIONAL INFORMATION
4° slant Angle

OBSERVATION DATE <i>5-26-88</i>					START TIME <i>11 33</i>	END TIME <i>12 13</i>
SEC MIN	0	15	30	45	COMMENTS	
1	0	0	0	0		
2	0	0	0	0		
3	0	0	0	0		
4	0	0	0	0		
5	0	0	0	0		
6	0	0	0	0		
7	0	0	0	0		
8	0	0	0	0		
9	0	0	0	0		
10	0	0	0	0		
11	0	0	0	0		
12	0	0	0	0		
13	0	0	0	0		
14	0	0	0	0		
15	0	0	0	0		
16	0	0	0	0		
17	0	0	0	0		
18	0	0	0	0		
19	0	0	0	0		
20	0	0*	0	0	<i>11 54 stop</i>	
21	0	0	0	0	<i>*1202 START</i>	
22	0	0	0	0		
23	0	0	0	0		
24	0	0	0	0		
25	0	0	0	0		
26	0	0	0	0		
27	0	0	0	0		
28	0	0	0	0		
29	0	0	0	0		
30	0	0	0	0		

OBSERVER'S NAME (PRINT) <i>Paul A. Minor</i>	
OBSERVER'S SIGNATURE <i>Paul Minor</i>	DATE <i>5-26-88</i>
ORGANIZATION <i>Eastern Technical Associates</i>	
CERTIFIED BY <i>Eastern Technical Associates</i>	DATE <i>3-9-88</i>
CONTINUED ON VEO FORM NUMBER	
009	

VISIBLE EMISSION OBSERVATION FORM

Test 5 8 26
No. 609

COMPANY NAME Alliance Construction Corp.

STREET ADDRESS 311 Plum St

CITY Durham STATE N.C. ZIP

PHONE (KEY CONTACT) SOURCE ID NUMBER

PROCESS EQUIPMENT Asphalt Rotary Kiln OPERATING MODE Running

CONTROL EQUIPMENT Baghouse OPERATING MODE Running

DESCRIBE EMISSION POINT 3'x4 Baghouse stack

HEIGHT ABOVE GROUND LEVEL 28' HEIGHT RELATIVE TO OBSERVER
Start 20' End 20'

DISTANCE FROM OBSERVER 180' End 180' DIRECTION FROM OBSERVER
Start NW End NW

DESCRIBE EMISSIONS
Start NO visible emissions End NO visible emissions

EMISSION COLOR None IF WATER DROPLET PLUME NO
Start None End None Attached ☐ Detached ☐

POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED
3' Above stack opening End 3' Above stack opening

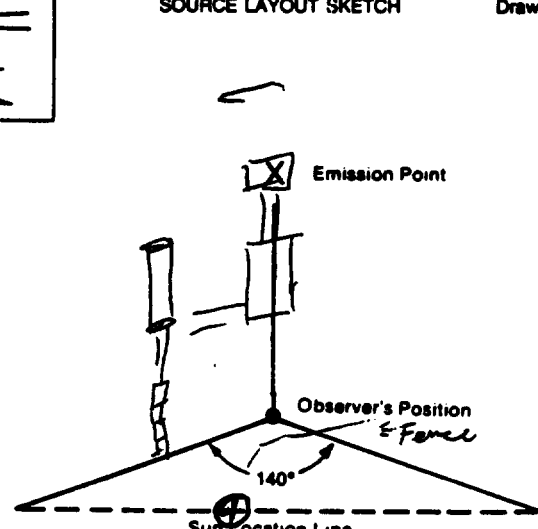
PLUME BACKGROUND
Start clear sky End clear sky

BACKGROUND COLOR Blue End Blue SKY CONDITIONS
Start clear End clear

WIND SPEED 3-5 mph End 3-5 mph WIND DIRECTION
Start NE End NE

AMBIENT TEMP 66°F End 66°F WET BULB TEMP 62°F RH, percent

SOURCE LAYOUT SKETCH Draw North Arrow

Stack with plume 

40° slant Angle

OBSERVATION DATE 5-26-88				START TIME 1213	END TIME 1221
SEC MIN	0	15	30	45	COMMENTS
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8					
9					
10					
11					
12					
13					
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17					
18					
19					
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21					
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23					
24					
25					
26					
27					
28					
29					
30					

OBSERVER'S NAME (PRINT) Paul A. Minor

OBSERVER'S SIGNATURE Paul Minor DATE 5-26-88

ORGANIZATION Eastern Technical Associates

CERTIFIED BY Eastern Technical Associates DATE 5-9-88

CONTINUED ON VEO FORM NUMBER

APPENDIX C

CALIBRATION DATA

ENTROPY

QUALITY ASSURANCE PROCEDURES

General. Each item of field test equipment purchased or constructed by Entropy is assigned a unique, permanent identification number. New items for which calibration is required are calibrated before initial field use. Equipment whose calibration status may change with use or with time is inspected in the field before testing begins, and again upon return from each field use. When an item of equipment is found to be out of calibration, it is adjusted and recalibrated or retired from service. All equipment is periodically recalibrated in full, regardless of the outcome of these regular inspections.

Calibrations are conducted in a manner and at a frequency which meet or exceed U. S. EPA specifications. Entropy follows the calibration procedures outlined in EPA Reference Methods, and those recommended within the Quality Assurance Handbook for Air Pollution Measurement Systems: Volume III (EPA-600/4-77-027b, August, 1977). When the Reference Methods are inapplicable, Entropy uses methods such as those prescribed by the American Society for Testing and Materials (ASTM).

Data obtained during calibrations are recorded on standardized forms, which are checked for completeness and accuracy by the Quality Assurance Manager or the Quality Assurance Director. Data reduction and subsequent calculations are performed using Entropy's in-house computer facilities. Calculations are generally performed at least twice as a check for accuracy. Copies of calibration data are included in the test or project reports.

Inspection and Maintenance. An effective preventive maintenance program is necessary to ensure data quality. Each item of equipment returning from the field is inspected before it is returned to storage. During the course of these inspections, items are cleaned, repaired, reconditioned, and recalibrated where necessary.

Each item of equipment transported to the field for this test program was inspected again before being packed. Entropy performs these quality assurance activities prior to departure for the job site to detect equipment problems which may originate during periods of storage. This minimizes lost time on site due to equipment failure.

ENTROPY

Occasional equipment failure in the field is unavoidable despite the most rigorous inspection and maintenance procedures. For this reason, Entropy routinely transports sufficient backup equipment to the job site to have complete redundancy of all critical sampling train components.

Calibration. Emissions sampling equipment that requires calibration includes the nozzle, pitot tube, pressure gauges, thermometers, flow meters, dry gas meters, and barometers. The following sections elaborate on the calibration procedures followed by Entropy for these items of equipment. Calibration data for the specific items of equipment used for this test program follow the text.

Nozzles. Each probe nozzle is uniquely and permanently identified at the time of purchase, and calibrated before initial field use. The inside diameter of the nozzle is measured to the nearest 0.001 in. using a micrometer. Five measurements are made using different diameters each time. If the difference between the high and the low numbers does not exceed 0.004 inch, the average of the five measurements is used. If the difference exceeds this amount, or when the nozzle becomes nicked, dented, or corroded, the nozzle is reshaped, sharpened, and recalibrated.

Pitot Tubes. All Type S pitot tubes used by Entropy, whether separate or attached to a sampling probe, are constructed in-house or by Nutech Corporation. Each pitot is calibrated when new in accordance with the geometry standards contained in EPA Reference Method 2. A Type S pitot tube, constructed and positioned according to these standards, will have a coefficient of 0.84 ± 0.02 . This coefficient should not change as long as the pitot tube is not damaged.

Each pitot tube is inspected visually before it is transported to the field. If this inspection indicates damage or raises doubt that the pitot remains in accordance with the EPA geometry standards, the pitot tube is not used until it has been refurbished and recalibrated.

Differential Pressure Gauges. Some meter consoles used by Entropy are equipped with 10 in. W.C. inclined-vertical manometers. Fluid manometers

do not require calibration other than leak checks. Manometers are leak-checked in the field prior to each test series, and again upon return from the field.

Most of Entropy's meter consoles are equipped with Magnehelic differential pressure gauges. Each set of gauges is calibrated initially over its full range, 0-10 inches W.C. After each field use, the calibration of the gauge set is checked against an inclined manometer at the average Δp encountered during the test. If the agreement is within ± 5 percent, the calibration is acceptable.

Thermometers

Impinger Thermometer. On site, prior to the start of testing, the thermometer used to monitor the temperature of the gas leaving the last impinger is compared with a mercury-in-glass thermometer which meets ASTM E-1 specifications. The impinger thermometer is adjusted if necessary until it agrees within 2°F of the reference thermometer. (If the thermometer is not adjustable, it is labeled with a correction factor).

Dry Gas Meter Thermometer. The thermometer used to measure the temperature of the metered gas sample is checked prior to each field trip against an ASTM mercury-in-glass thermometer. The dry gas meter thermometer is acceptable if the values agree within 5.4°F . Thermometers not meeting this requirement are adjusted or labeled with a correction factor.

Flue Gas Temperature Sensor. All thermocouples employed by Entropy for the measurement of flue gas temperatures are calibrated upon receipt. Initial calibrations are performed at three points (ice bath, boiling water, and hot oil). An ASTM mercury-in-glass thermometer is used as a reference. The thermocouple is acceptable if the agreement is within 1.5 percent (absolute) at each of the three calibration points.

On site, prior to the start of testing, the reading from the stack gas thermocouple-potentiometer combination is compared with a mercury-in-glass reference thermometer. If the two agree within 1.5 percent (absolute), the thermocouple and potentiometer are considered to be in proper working order for the test series.

After each field use, the thermocouple-potentiometer system is compared with an ASTM mercury-in-glass reference thermometer at a temperature within 10 percent of the average absolute flue gas temperature. If the absolute temperatures agree within 1.5 percent, the temperature data are considered valid.

Dry Gas Meter and Orifice. The dry gas meter and orifice are calibrated simultaneously. There are two calibration procedures. The full calibration is a complete laboratory procedure used to obtain the calibration factor of the dry gas meter before its first use and periodically thereafter. Full calibrations are performed at three different orifice settings (flow rates). A simpler procedure, the posttest calibration, is designed to check whether the calibration factor has changed. Posttest calibrations are performed after each field test series at an intermediate orifice setting (based on the test data) and at the maximum vacuum reached during the test.

Entropy uses as a transfer standard a dry gas meter that is calibrated annually against a spirometer. During the annual calibration, triplicate calibration runs are performed at seven flow rates ranging from 0.25 to 1.40 cfm.

Dry Gas Meter. Each metering system receives a full calibration at the time of purchase, and a posttest calibration after each field use. If the calibration factor, Y , deviates by less than five percent from the initial value, the test data are acceptable. If Y deviates by more than five percent, the meter is recalibrated and the meter coefficient (initial or recalibrated) that yields the lowest sample volume for the test runs is used.

EPA Reference Method 5 calls for another full calibration anytime the posttest calibration check indicates that Y has changed by more than five percent. Standard practice at Entropy is to recalibrate the dry gas meter anytime Y is found to be outside the range $0.98 \leq Y \leq 1.02$.

Orifice. An orifice calibration factor is calculated for each flow setting during a full calibration. If the range of values does not vary by more than 0.15 in. H_2O over the range of 0.4 to 4.0 in. H_2O , the arithmetic average of the values obtained during the calibration is used.

Barometer. Each field barometer is adjusted before each test series to agree within ± 0.1 inches of a reference aneroid barometer. The reference barometer is checked weekly against the station pressure value (corrected for elevation difference) reported by the National Weather Service station at the Raleigh-Durham airport, approximately 2.5 miles from Entropy's location.

Dry Gas Meter Identification: 6838323 Calibration by: N. Henden

Date: 3-26-86 Barometric Pressure (P_b): 30.12 in. Hg

*Date: _____ *Barometric Pressure (P_b): _____ in. Hg



Approx. Flow Rate (Q) cfm	Spirometer		Dry Gas Meter		Pressure (Δp) in. H ₂ O	Time (θ) min.	Flow Rate (Q) cfm	Meter Meter Coeff. (Y_{ds})	Avg. Meter Coeff. (\bar{Y}_{ds})
	Gas Volume (V_s) ft ³	Temp. (t_s) °F	Gas Volume (V_{ds}) ft ³	Temp. (t_{ds}) °F					
0.3	2.924	82.4	2.906	81	0.40	10.0	0.2864	1.0026	
	2.969	82.8	2.869	81	0.40	10.0	0.2906	1.0304	
	3.052	83.3	3.501	81	0.40	10.0	0.3571	1.0377	
	4.235	80.6	4.380	77	0.85	10.0	0.4125	0.9700	
0.4	4.545	80.6	4.370	78	0.85	10.0	0.4427	1.0329	
	4.417	80.6	4.345	79	0.85	10.0	0.4302	1.0114	
	5.328	78.8	5.206	75	1.10	10.0	0.5271	1.0135	
	5.383	79.7	5.212	77	1.15	10.0	0.5299	1.0248	
0.5	5.301	79.7	5.166	78	1.15	10.0	0.5299	1.0200	
	8.288	81	8.216	79	2.65	10.0	0.8067	0.9985	
	8.397	82	8.214	80	2.65	10.0	0.8158	1.0119	
	8.352	82.4	8.199	80	2.65	10.0	0.8108	1.0076	
0.8	10.638	83.3	10.442	81	4.15	10.0	1.040	1.0014	
	10.656	83.3	10.584	81.5	4.15	10.0	1.042	0.9981	
	10.528	83.3	10.450	81.5	4.15	10.0	1.0296	0.9941	

$$Y_{ds} = \frac{(V_s)(t_{ds} + 460)(P_b)}{(V_{ds})(t_s + 460)(P_h + (P / 13.6))}$$

$$Q = (17.64) \frac{(P_b)(V_s)}{(t_s + 460)(\theta)}$$

Dry Gas Meter Identification: 6838323 Calibration by: J. m. Donohue Page 1 of 2

Date: 2-26-88 Barometric Pressure (P_b): 29.26 in. Hg
 #Date: 2-29-88 Barometric Pressure (P_b): 29.74 in. Hg
 #Barometric Pressure (P_b): 29.71 in. Hg
 #Barometric Pressure (P_b): 29.68 in. Hg



Approx. Flow Rate (Q) cfm	Spirometer		Dry Gas Meter		Pressure (Δp) in. H ₂ O	Time (t) min.	Flow Rate (Q) cfm	Meter Meter Coeff. (V_{ds})	Avg. Meter Coeff. (\bar{V}_{ds})
	Gas Volume (V_s) ft ³	Temp. (t_s) °F	Gas Volume (V_{ds}) ft ³	Temp. (t_{ds}) °F					
	2.404	78.8	2.515	76	0.33	10:00	0.2303	0.9425	
	2.532	78.8	2.523	76.5	0.37	10:00	0.2426	0.9984	
	2.582	78.8	2.527	77	0.38	10:00	0.2478	1.0194	
	4.135	78.8	4.075	75	0.67	10:00	0.4026	1.0059	
	4.171	78.8	4.052	75	0.65	10:00	0.4061	1.0205	
	4.162	78.8	4.019	75.5	0.65	10:00	0.4052	1.0276	
	5.036	78.8	4.887	76	0.95	10:00	0.4824	1.0227	
	5.064	80.0	4.900	76	0.95	10:00	0.4840	1.0234	
	5.027	80.6	4.839	76	0.95	10:00	0.4800	1.0276	
	7.782	78.8	7.711	75	2.04	10:00	0.7582	0.9977	
	7.851	78.8	7.884	75	2.03	10:00	0.7644	1.0095	
	7.814	78.8	7.724	75	2.05	10:00	0.7608	0.9995	
	9.900	78.8	9.845	75	3.17	10:00	0.9639	0.9907	
	9.900	78.8	9.773	75	3.17	10:00	0.9639	0.9980	
	10.018	78.8	9.882	76	3.22	10:00	0.9754	1.0005	

Meter Box Number: N8

Calibration by: DB

Standard Meter Number: 6838323 Standard Meter Gamma: 1.0042

Date: 1-5-88

Barometric Pressure (P_b): 29.95 in. Hg

*Date: _____

*Barometric Pressure (P_b): _____ in. Hg

METERBOX CALIBRATION

Standard Meter			Meter Box Metering System				
Gas Volume (V_{ds}) ft ³	Temp. (t_{ds}) °F	Time (θ) min.	Orifice Setting (ΔH) in. H ₂ O	Gas Volume (V_d) ft ³	Temp. (t_d) °F	Coeff. (y_d)	ΔH_e in. H ₂ O
4.015	66	10	0.50	4.199	85	0.9937	1.653
4.008	66	10	0.50	4.176	84	0.9956	1.662
8.127	66	10	2.10	8.364	86	1.0077	1.691
8.111	66	10	2.10	8.331	88	1.0134	1.691
12.162	66	10	4.80	12.321	91	1.0263	1.710
12.142	66	10	4.80	12.317	93	1.0286	1.709
Average						1.0109	1.686

$$y_d = \frac{y_{ds} * V_{ds} * (t_d + 460) * P_b}{V_d * (t_{ds} + 460) * (P_b + H/13.6)}$$

$$\Delta H_e = \frac{0.0317 * \Delta H}{P_b * (t_d + 460)} * \left[\frac{(t_{ds} + 460) * \theta}{y_{ds} * V_{ds}} \right]^2$$

Meter Box Number: 18Calibration by: JGMeter Box Vacuum: 4 in. HgJob 5911AllianceStandard Meter Number: 6838323 Standard Meter Gamma: 1.001Date: 6-3-88Barometric Pressure (P_b): 29.34 in. Hg

POST TEST CALIBRATION

Standard Meter			Meter Box Metering System				
Gas Volume (V_{ds}) ft ³	Temp. (t_{ds}) °F	Time (θ) min.	Orifice Setting (ΔH) in. H ₂ O	Gas Volume (V_d) ft ³	Temp. (t_d) °F	Coeff. (Y_d)	ΔH_e in. H ₂ O
9.376	74	10	2.80	9.502	91	1.012	1.77
9.384	74	10	2.80	9.533	94	1.015	1.76
9.399	74	10	2.80	9.521	97	1.023	1.75
Average						1.016	1.76

$$Y_d = \frac{Y_{ds} * V_{ds} * (t_d + 460) * P_b}{V_d * (t_{ds} + 460) * (P_b + \Delta H/13.6)}$$

$$\Delta H_e = \frac{0.0317 * \Delta H}{P_b * (t_d + 460)} * \left[\frac{(t_{ds} + 460) * \theta}{Y_{ds} * V_{ds}} \right]^2$$

NOTE: All diameters measured in inches.

APPENDIX D

SAMPLING AND ANALYTICAL PROCEDURES

ENTROPY

VISIBLE EMISSION OBSERVATION FORM

TEST # 2. 22
No. 005

COMPANY NAME <i>Alliance Construction Corp</i>		
STREET ADDRESS <i>311 Plum st</i>		
CITY <i>Durham</i>	STATE <i>N.C.</i>	ZIP
PHONE (KEY CONTACT)		SOURCE ID NUMBER

PROCESS EQUIPMENT <i>Rotary kiln</i>	OPERATING MODE <i>Running</i>
CONTROL EQUIPMENT	OPERATING MODE <i>Running</i>

DESCRIBE EMISSION POINT <i>4' x 3' stack from Bay house</i>	
HEIGHT ABOVE GROUND LEVEL <i>28'</i>	HEIGHT RELATIVE TO OBSERVER Start <i>23'</i> End <i>28'</i>
DISTANCE FROM OBSERVER Start <i>180'</i> End <i>180'</i>	DIRECTION FROM OBSERVER Start <i>NW</i> End <i>NW</i>

DESCRIBE EMISSIONS	
Start <i>None</i>	End <i>NO visible Emissions</i>
EMISSION COLOR	IF WATER DROPLET PLUME NO
Start <i>None</i> End <i>None</i>	Attached <input type="checkbox"/> Detached <input type="checkbox"/>
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED	
Start <i>3' Above stack opening</i>	End <i>3' Above stack opening</i>

DESCRIBE PLUME BACKGROUND	
Start <i>Clear Sky</i>	End <i>clear sky</i>
BACKGROUND COLOR	SKY CONDITIONS
Start <i>Blue</i> End <i>Blue</i>	Start <i>Clear</i> End <i>Clear</i>
WIND SPEED	WIND DIRECTION
Start <i>3-5 mph</i> End <i>3-5 mph</i>	Start <i>NNE</i> End <i>NNE</i>
AMBIENT TEMP	WET BULB TEMP
Start <i>53°F</i> End <i>57°F</i>	<i>45°F</i>
RH. percent	

Stack with Plume	
Sun	
Wind	
SOURCE LAYOUT SKETCH	
Draw North Arrow	

ADDITIONAL INFORMATION
<i>7° stack Angle</i>

OBSERVATION DATE <i>5-26-88</i>		START TIME <i>1000</i>		END TIME <i>1030</i>
SEC	0	15	30	45
MIN				
1	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
2	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
3	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
4	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
5	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
6	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
7	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
8	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
9	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
10	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
11	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
12	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
13	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
14	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
15	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
16	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
17	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
18	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
19	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
20	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
21	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
22	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
23	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
24	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
25	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
26	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
27	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
28	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
29	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
30	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>

OBSERVER'S NAME (PRINT) <i>Paul A. Minor</i>	
OBSERVER'S SIGNATURE <i>Paul Min</i>	DATE <i>5-26-88</i>
ORGANIZATION <i>Eastern Technical Associates</i>	
CERTIFIED BY <i>Eastern technical Associates</i>	DATE <i>3/9/88</i>
CONTINUED ON VEO FORM NUMBER	
<i>006</i>	