

SET 1957 05 1280

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BENZENE SAMPLING PROGRAM
AT COKE BY-PRODUCT RECOVERY PLANTS:
BETHLEHEM STEEL CORPORATION
BETHLEHEM, PENNSYLVANIA

EPA Contract 68-02-2813
Work Assignment 48
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1.0 INTRODUCTION

Scott Environmental Services, a division of Scott Environmental Technology, Inc. conducted a testing program at Bethlehem Steel Corporation, Bethlehem, Pennsylvania to determine benzene emissions from six sources in the coke byproduct recovery plant. The work was performed for the United States Environmental Protection Agency, Emissions Measurement Branch, under Contract No. 68-02-2813, Work Assignment 48. Data collected from this plant and six others are being used for the development of a possible National Emission Standard for Hazardous Air Pollutants for benzene.

Sampling was conducted at Bethlehem Steel from July 7th to 24th, 1980. Integrated air samples and liquid samples for benzene analysis were collected from the following processes: Denver flotation unit, naphthalene melt pit, naphthalene drying tank, cooling tower - direct water final cooler, light oil condenser vent, and the tar decanter from #5 battery.



2.0 SUMMARY OF RESULTS

Process	Benzene Emission Rate	
	<u>lb/hr.</u>	<u>kg/hr.</u>
Cooling Tower	73.4	33.3
Tar Decanter	2.6	1.2
Light Oil Condenser Vent	28.8	13.1
Naphthalene Drying Tank	0.04*	0.02*
Denver Float Units	28.2	12.8
Naphthalene Melt Pit	19.8*	9.0*

*Not a continuous process.

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3.0 RESULTS AND DISCUSSIONS

3.1 COOLING TOWER

The cooling tower circulates the hot water from the direct water final coolers after the naphthalene is removed via the Denver float units. The tower is about 30 feet high and has four 13-foot diameter fans on top for pulling air countercurrent to the falling water. Benzene which is contained in the final cooler water is in part released as a vapor as it passes downward through the cooling tower. This benzene is picked up as a contaminant in the final cooler spray towers.

The three tests run on the cooling tower were fairly consistent, ranging from 66 to 79 lb/hr., with an average result of 73.4 lb/hr. The stack velocities for each run reported in Table 3-1 are an average of the velocities measured across the 24-point traverse. The velocities measured were generally lower near the stack wall and in the center over the hub of the fan, as would be expected. Field data (showing the measured velocities) can be found in Appendix B.

All stack flow rates were corrected to the average conditions at which the benzene concentrations were measured in the Tedlar bags; assumed to be saturated at 68°F and 29.92 inches Hg (2 1/2 % moisture). Example calculations are shown in Appendix A.

Liquid samples were collected from the hot and cold wells. Average benzene concentrations were 6.8 ppm and 3.5 ppm respectively. The hot and cold well temperatures were 86°F and 82°F, indicating that the cooling tower was not really cooling the water significantly, and as noted on page 6-1,



TABLE 3-1
COOLING TOWER DATA SUMMARY

Process: Cooling Tower-direct water final cooler Stack Diameter: 13 feet (1 of 4 stacks)
Plant: Bethlehem Steel, Bethlehem, PA Stack Area: 133 ft.²

Run No.	Date	Sample Period	Stack Temp. °F	Stack Barometric Pressure (in. Hg)	Stack Velocity (ft/min.)	Flowrate		Benzene Concentration (ppm)	Benzene Emission Rate (lb/hr)	
						Stack Conditions (ACFM)	Standard Conditions (SCFM)		1 Fan	4 Fans
1	7/10/80	1034-1140	84	29.58	870	115,000	109,000	12.56	16.6	66.2
2	7/10/80	1150-1255	84	29.58	905	120,000	114,000	14.38	19.9	79.5
3	7/10/80	1417-1520	83	29.56	860	114,000	108,000	14.27	18.6	74.5
									Ave.	73.4

Standard conditions: Saturated at 68°F, 29.92 in Hg.

LIQUID SAMPLE DATA SUMMARY

Sample Location	Date	Time	Benzene Concentration (ppm by weight)	
			Sample Temp. (°F)	
Hot Well	7/10/80	15:40	86°F	7.1) Average 6.8 6.4)
Cold Well	7/10/80	15:45	82°F	3.2) Average 3.5 3.8)



was due to the malfunction of a faulty level control. Past plant operating experience shows that an average temperature reduction from 86°F to 76°F is experienced during the summer months and from 62°F to 48°F during the winter months.



3.2 TAR DECANter

The tar decanter collects tar and flushing liquor from the #5 battery and from the primary coolers. It is allowed to settle and the flushing liquor is decanted off the top while the tar is drained from the bottom. The decanter is vented to the atmosphere, and is a potential benzene emission source.

The average result for the tar decanter emissions is 2.6 lb/hr., with a range of 1.4 to 3.7 lb/hr. Velocities measured were quite consistent over all three runs but the concentration of benzene differed considerably, as shown in Table 3-2. The large differences between sample runs is probably due to fluctuations or changes in the process feed streams, as the samples were not all collected on the same day.

Liquid samples were collected at three locations: The surface liquid in the decanter, the inlet to the decanter from the coke gas crossover main from the #5 battery, and the inlet to the decanter from the primary cooler. Average benzene concentrations in the liquid samples were: In the surface samples - 1.6 ppm, in the crossover main samples - 4.9 ppm, and in the primary cooler samples - 16.4 ppm in the light fraction (flushing liquor) and 1810 ppm in the heavy fraction (tar).



TABLE 3-2

TAR DECANTER DATA SUMMARY

Process: Tar Decanter - #5 battery
 Plant: Bethlehem Steel, Bethlehem, PA
 Stack Diameter: 10-1/8"
 Stack Area: 0.559 ft.²

Run No.	Date	Sample Period	Stack Temp. (°F)	Barometric Pressure (in.Hg)	Stack Velocity (ft/min.)	Flowrate Stack Conditions (ACFM)	Flowrate Standard Conditions (SCFM)	Benzene Concentration (ppm)	Benzene Emission Rate (lb/hr)
1	7/8/80	1453-1523	158	29.53	500	280	170	1447.2	2.9
2	7/9/80	1020-1121	161	29.71	490	275	160	717.8	1.4
3	7/9/80	1530-1600	163	29.67	490	280	150	1975.0	3.6
Standard Conditions: 68°F, 29.92 inches Hg.									Ave. 2.6

LIQUID SAMPLE DATA

Sample Location	Date	Time	Sample Temp. (°F)	Benzene Conc. (ppm by Weight)
Flushing liquor on surface	7/8/80	1525	176	5.6
	7/8/80	1600	180	4.2 Ave. 4.9
Flushing liquor inlet from coke gas crossover main	7/9/80	1415	N.A.	1.6
Inlet to decanter from primary cooler Heavy fraction (tar)	7/9/80	1545	140	1736 Ave. 1810 1888
Light fraction (liquor)	7/9/80	1545	140	16.4 Ave. 16.4 16.3



3.3 LIGHT OIL CONDENSER VENT

Benzene in the wash oil is removed by heating the wash oil and condensing out the benzene. Noncondensibles in the wash oil, possibly including some benzene, are vented to the atmosphere. For this reason the light oil condenser vent was considered a potential benzene emission source.

The average of the three good runs on the light oil condenser vent (Run 3 was voided) was 28.8 lb/hr., as shown in Table 3-3. Although the flow rate was very low, the benzene concentration was approximately 10% so the mass emission rates were comparable to higher flow sources.



TABLE 3-3
LIGHT OIL CONDENSER VENT DATA SUMMARY

Process: Light Oil Condenser Vent									
Plant: Bethlehem Steel, Bethlehem, PA									
Stack Diameter: 6" ²									
Stack Area: 0.20 ft.									
Run No.	Date	Sample Period	Stack Temp. (°F)	Barometric Pressure (in. Hg)	Stack Velocity (ft/min.)	Flowrate	Flowrate	Benzene	Benzene
						Stack Conditions (ACFM)	Standard Conditions (SCFM)	Concen- tration (ppm)	Emission Rate (lb/hr.)
1	7/11/80	1015-1045	95	29.51	120	24	23	91,900	25.3
2	7/11/80	1056-1126	96	29.51	130	25	23	109,800	31.1
3	7/11/80	1212-1242	109	29.51	120	23	21	53,300	*
4	7/11/80	1600-1630	104	29.49	120	24	22	110,500	29.9
Ave.									28.8

*Run 3 not included in calculations due to sampling system leak.

Standard Conditions: Saturated at 68°F, 29.92 in. Hg.

NOTE: No liquid samples were taken at this source.



3.4 NAPHTHALENE DRYING TANK

The drying tank collects the melted naphthalene after the melt process, and steam is applied to the tank to drive off any water present in the naphthalene. This is a batch process and runs for approximately 12 to 14 hours, during which time benzene is emitted along with the steam, through the open process vents on the tank.

Testing the naphthalene drying tank involved a special test modification using impingers which is described in detail in Section 6.4. The test method was given a trial run on July 18, and the resulting total emission rate (stack plus vent) was 1.57 lb/hr. A series of 8 tests were run on July 22 over a 15-hour period, and the average for these runs was 0.04 lb/hr. The results of the 8 tests varied widely since the drying cycle is a batch process. As expected, the emissions dropped off as the cycle progressed and the water was driven off the naphthalene, and emissions increased when the tank temperature increased, as seen in Table 3-4. Vent "A" refers to the process vent stack, and "B" is the large opening in the tank for steam lines, which was tested as a vent.

The benzene emissions from the drying tank vary widely from day to day depending on how long the naphthalene was heated in the melt pit prior to transferral to the drying tank. Ideally the melt process and the drying tank should be sampled on the same day to determine benzene emissions from the naphthalene handling processes as a whole.



TABLE 3-4
NAPHTHALENE DRYING TANK DATA SUMMARY

Process: Naphthalene Drying Tank
Plant: Bethlehem Steel, Bethlehem, PA
Stack Diameter: A: 6" B: 22"
Stack Area: A: 0.196 ft² B: 1.6 ft.²
Barometric Pressure: 29.5 in. Hg.

Run No.	Date	Test Period	Stack Temp. (°F)	Stack Velocity (fpm)		Stack Flowrate (ACFM)		Standard Flowrate (SCFM) Total	Benzene Concentration (ppm)	Benzene Emission Rate (lb/hr.)	
				A	B	A	B				Total
T	7/18/80	1353-1423	206	630	350	120	560	680	71	1824	1.57
1	7/22/80	1337-1410	209	850	610	170	980	1150	106	168.60	0.217
2	7/22/80	1610-1640	210	730	110	140	170	310	3	428.11	0.016
3	7/22/80	1813-1843	202	690	*	140	*	140	18	32.34	0.007
4	7/22/80	2130-2200	195	590	*	110	*	110	27	16.09	0.005
5	7/23/80	2415-2445	192	540	*	110	*	110	27	40.78	0.013
6	7/23/80	0220-0300	190	590	*	120	*	120	34	45.40	0.019
7	7/23/80	0255-0320	210	780	100	150	250	400	14	218.16	0.037
8	7/23/80	0404-0455	199	660	*	130	*	130	22	117.05	0.032
											Ave. 0.043

Standard Conditions: Saturated at 68°F, 29.92 in. Hg.

NOTE: No liquid samples were collected at this source.

* No flow detected with anemometer.



3.5 DENVER FLOTATION UNITS

The Denver units skim naphthalene from the surface of the hot water collected from the final coolers. The skimming is accomplished by blades rotating on a shaft that spans the length of the flotation tank. The system is comprised of four adjacent units, three of which are in operation at any given time. This is a constant operation and constitutes a potential benzene emission source because the impure naphthalene is contaminated with benzene and the Denver units are agitated and at temperatures above ambient level.

The results of the tests of the Denver float units are presented in Table 3-5. The tracer gas sampling strategy and sampler locations for each test are detailed in Section 6.5. Each test consisted of two runs, with the second run designed to estimate the contribution of the unit adjacent to the test unit (#2) to the total being measured from the test unit (#1). This became irrelevant in tests 2 and 3 because unit 2 was not in operation.

In tests 2 and 3 the data from sampler 3 was rejected because the sampler was inadvertently located adjacent to a "hot spot" benzene emission point in the naphthalene melt pit.

In each test the benzene/isobutane ratio is lower for the center sampler than the outer samplers. This would be expected because the tracer discharge manifold was not long enough to cover the entire tank axis. Thus, the center portion of the tank shows a higher relative isobutane concentration.



TABLE 3-5

DENVER FLOAT UNITS

Test 1, Run 1
Tracer on Tank #1
Isobutane release rate - 1.39 lb/hr

Denver Units Operating: 1, 2, 3
Date: 7/8/80
Test Start: 11:24

Sample Loc.	Conc. of Benzene (ppm)	Conc. of Isobutane (ppm)	Mass to Mass Ratio ϕ/ic_4	F*	lb/hr Benzene	kg/hr Benzene
1	3.51	0.50	9.38	0.739	9.60	4.36
2	8.61	1.72	6.73	0.789	7.35	3.34
3	14.51	2.02	9.66	0.665	8.91	4.05
					Avg. 8.62	Avg. 3.92

Test 1, Run 2
Tracer on Tank #2
Isobutane release rate - 1.25 lb/hr

Date: 7/8/80
Test Start: 12:09

1	3.03	0.15
2	7.69	0.40
3	16.61	1.13

Test 2, Run 1
Tracer on Tank #1
Isobutane release rate - 1.27 lb/hr

Denver Units Operating: 1, 3, 4
Date: 7/15/80
Test Start: 10:30

1	5.16	1.02	6.80	1.00	8.64	3.93
2	5.42	1.09	6.68	1.00	8.48	3.85
3	18.96	1.16	21.94**	1.00	27.86**	12.66**
					Avg. 8.56	Avg. 3.89

Test 2, Run 2
Tracer on Tank #2
Isobutane release rate - 1.25

Date: 7/15/80
Test Start: 11:19

1	4.42	0.20
2	5.68	0.48
3	18.45	2.40

* Fraction from Tank #1.

** Data rejected, interference from another source.



Table 3-5
(Continued)

Test 3, Run 1
Tracer on Tank #2
Isobutane release rate - 1.28 lb/hr

Denver Units Operating: 1, 3, 4
Date: 7/15/80
Test Start: 13:30

<u>Sample Loc.</u>	<u>Conc. of Benzene (ppm)</u>	<u>Conc. of Isobutane (ppm)</u>	<u>Mass to Mass Ratio ϕ/ic_4</u>	<u>F*</u>	<u>lb/hr Benzene</u>	<u>kg/hr Benzene</u>
1	7.13	0.22				
2	8.39	0.50				
3	14.00	1.97				

Test 3, Run 2
Tracer on Tank 1
Isobutane release rate 1.28 lb/hr

Date: 7/15/80
Test Start: 14:00

1	6.64	0.95	9.45	1.00	12.10	5.5
2	7.16	1.26	7.66	1.00	9.80	4.45
3	13.67	1.24	14.83*	1.00	18.98**	8.63**

Avg. 10.95 Avg. 4.98

* Fraction from Tank #1.

** Data rejected, interference from another source.



The benzene emission rates for a typical Denver Float Unit tank were determined to be 8.6, 8.6 and 11.0 pounds per hour. While statistical determination of confidence limits is not possible, the relative good agreement of data points and the small estimated error due to the assumptions made in the calculations lead to the judgment that the emission rates are within one pound per hour of the true rate at each process/ambient condition tested. The total emissions from the Denver unit with three tanks in operation would be 26, 26 and 33 pounds per hour.

Test 3 was performed on the same day as Test 2 and under the same experimental conditions except that the ambient temperature was approximately 5°F higher in Test 3. A comparison of corresponding Test 2 and Test 3 data (2-1 to 3-2 and 2-2 to 3-1) shows that the isobutane tracer concentration changed very little from test to test. Yet, the benzene is clearly higher at Sampling Locations 1 and 2 in each case. This indicates that the higher emission rates in Test 3 can be attributable to the higher ambient temperature.



3.6 NAPHTHALENE MELT PIT

The melt pit collects the naphthalene slurry that was skimmed off in the Denver units, and once a day steam is applied to melt the naphthalene to facilitate pumping into a drainage tank. Benzene contained in the naphthalene cake is released when the steam is applied to the melt pit.

The results of the four tracer gas tests on the naphthalene melt pit during melt operations are shown in Table 3-6. For each test the first half-hour run was conducted while the cake was still melting. The second run was made after ammonium sulfate salt had been added to the melt and prior to its being pumped to the drying tank. There are considerable test to test differences in benzene emission rates. It is believed that the differences are real, and that they are the result of variations in the process step timing, the portion of the process cycle sampled and ambient conditions.

A test was performed on 7/17/80 after the melt was completed and the pit was beginning to refill. The results of this test are presented in Table 3-7. This test serves as the basis for estimates of emissions from the pit at times other than when the melt was in progress. This test was planned to assess the contribution of the Denver float unit to the melt pit emissions measured during the melt cycle. However, it became apparent that the melt pit made a substantial contribution to the benzene found in this test. On 7/22/80, three sets of grab air samples were collected over the melt pit at ground level. The results are as follows.



TABLE 3-6

NAPHTHALENE MELT PIT

Date: 7/15/80
Tracer Test #1, Run #1
Test Start - 8:00 a.m.

Isobutane Emission Rate: 1.16 lb/hr
0.53 kg/hr
Weather Conditions: Wind SSW 0-5 mph
Temp 75°F

Sample Loc.	Conc. of Benzene (ppm)	Conc. of Isobutane (ppm)	Mass to Mass Ratio ϕ/ic_4	lb/hr Benzene	kg/hr Benzene
1	11.48	0.713	21.66	25.13	11.42
2	17.54	1.02	23.06	26.75	12.16
3	16.58	0.93	23.97	27.81	12.64
Upwind	0.71	ND	--		
				Avg. 26.56	Avg. 12.07

Date: 7/15/80
Tracer Test #1, Run #2
Test Start - 8:35 a.m.

Isobutane Emission Rate: 1.16 lb/hr
0.53 kg/hr
Weather Conditions: Wind SSW 0-5 mph
Temp 75°F

1	9.45	0.977	13.01	15.10	6.86
2	13.48	1.32	13.75	15.95	7.25
3	14.90	1.49	13.45	15.60	7.09
Upwind	1.03	ND			
				Avg. 15.55	Avg. 7.07

Date: 7/16/80
Tracer Test #2, Run #1
Test Start: 7:30 a.m.

Isobutane Emission Rate: 1.28 lb/hr
0.58 kg/hr
Weather Conditions: Wind SSW
Temp 75°F

1	14.99	1.25	16.16	20.86	9.40
2	15.18	1.52	13.41	17.16	7.80
3	10.22	0.754	18.24	23.35	10.61
Upwind	1.02	ND			
				Avg. 20.46	Avg. 9.30

Date: 7/16/80
* Tracer Test #2, Run #2
Test Start - 8:09 a.m.

Isobutane Emission Rate: 1.31 lb/hr
0.60 kg/hr
Weather Conditions: Wind SSW
Temp 75°F

1	11.35	1.54	9.93	11.22	5.10
2	5.48	2.12	3.47	4.55	2.07
3	8.87	1.39	8.57	11.23	5.10
Upwind	0.77	ND	--		
				Avg. 9.00*	Avg. 4.09*

* Run voided due to leak in flowmeter.



TABLE 3-6
(Continued)

Date: 7/17/80
Tracer Test #3, Run #1
Test Start - 7:15 a.m.

Isobutane Emission Rate: 1.26 lb/hr,
0.57 kg/hr
Weather Conditions: Wind - Variable
Temp. 75°F

Sample Loc.	Conc. of Benzene (ppm)	Conc. of Isobutane (ppm)	Mass to Mass Ratio ϕ/ic_4	lb/hr Benzene	kg/hr Benzene
1	6.56	0.80	11.03	13.90	6.32
2	6.86	1.41	6.54	8.24	3.75
3	6.80	1.78	5.14	6.48	2.95
Upwind	0.49	ND	--		
				Avg. 9.54	Avg. 4.34

Date: 7/17/80
Tracer Test #3, Run #2
Test Start - 8:18 a.m.

Isobutane Emission Rate: 1.24 lb/hr
0.56 kg/hr
Weather Conditions: Wind - Variable
Temp. 75°F

1	5.28	0.261	27.18	33.70	15.32
2	5.61	0.430	17.64	21.87	9.94
3	6.16	0.421	19.71	24.44	11.11
Upwind	0.61	ND			
				Avg. 26.67	Avg. 12.12

Date: 7/18/80
Tracer Test #4, Run #1
Test Start - 7:36 a.m.

Isobutane Emission Rate: 1.29 lb/hr
0.59 kg/hr
Weather Conditions: Wind N, Steady

1	18.60	3.31	7.56	9.75	4.43
2	19.68	6.84	3.87	4.99	2.67
3	19.44	4.79	5.46	7.04	3.20
Upwind	1.83	0.087	--		
				Avg. 7.26	Avg. 3.43

Date: 7/18/80
Tracer Test #4, Run #2
Test Start - 8:30 a.m.

Isobutane Emission Rate: 1.29 lb/hr
0.59 kg/hr
Weather Conditions: Wind N, Steady

1	4.41	2.57	2.31	2.98	1.35
2	5.70	3.99	1.92	2.48	1.13
3	6.18	4.50	1.85	2.39	1.09
Upwind	2.83	ND	--		
				Avg. 2.62	Avg. 1.19



TABLE 3-7

BACKGROUND FOR NAPHTHALENE MELT PIT

Date: 7/17/80
 Tracer Test #1, Run #1
 Test Start - 11:22 a.m.

Denver Units Operating - 1, 2, 3
 Isobutane Emission Rate: 1.28 lb/hr
 0.58 kg/hr
 Weather Conditions: Wind SSW, 0-5 mph
 Temp 80°F

Sample Loc.	Conc. of Benzene (ppm)	Conc. of Isobutane (ppm)	Mass to Mass Ratio ϕ/ic_4	lb/hr Benzene	kg/hr Benzene
1	14.65	3.01	6.55	8.38	3.81
2	15.21	3.89	5.25	6.72	3.05
3	9.71	2.04	6.42	6.94	3.15
Upwind	0.56	ND	--		
				Avg. 7.35	Avg. 3.34

Date: 7/17/80
 Tracer Test #1, Run #2
 Test Start - 11:55 a.m.

Denver Units Operating - 1, 2, 3
 Isobutane Emission Rate: 1.28 lb/hr
 0.58 kg/hr
 Weather Conditions: Wind SSW, 0-5 mph
 Temp 80°F

1	13.49	1.52	11.93	15.27	6.94
2	15.82	3.54	6.01	7.69	3.50
3	13.43	3.75	4.82	6.17	2.80
Upwind	0.25	ND	--		
				Avg. 9.71	Avg. 4.41



BENZENE OVER MELT PIT AT GROUND LEVEL

Grab Samples Collected 7/22/80

Time	Benzene Concentration (ppm)	
	<u>Edge of Pit</u>	<u>Middle of Pit</u>
1330	46	27
1800	67	36
2300	116	42

It can be seen that the benzene concentration was higher at the edge of the pit, which was above the point where incoming slurry splashed into the pit, than at the center of the pit. In addition, the concentrations increased with time as the pit filled.

The contribution of the Denver unit to the samples collected during the melt tests was estimated to be negligible because the plume rise from the heated pit caused the emissions from the Denver unit to rise well above the samplers. Furthermore, the top of the Denver unit from which point the Denver unit's emissions emanated was approximately six feet above ground level (top of melt pit). Thus, it is quite unlikely that the Denver unit emissions could reach the samplers during the tests on the melt pit when the melt was in progress.

The following engineering estimates of overall daily naphthalene melt pit emissions are based on all of the data collected. The benzene emission rate from the melt pit is highest during the time when the naphthalene cake is being melted. The emission rate during this half hour period is from 20 to 30 pounds per hour. During the following half hour the emissions decrease to the 10 to 20 pounds per hour range.



The emissions continue to decrease over the period that the melted naphthalene remains in the pit and the benzene content in the mix becomes depleted. Once the melt has been transferred to the drying tank and filling of the pit with slurry from the Denver units resumes, benzene emissions begin at the rate of three to six pounds per hour. As filling continues and the liquid level in the pit rises, the emission rate increases to the order of 10 pounds per hour or more until the next melt is started. These emission rates can easily vary by a factor of 2 or 3 from day to day. The temperature of the material in the pit is the primary variable which affects the benzene rate at any given time.



4.0 PROCESS DESCRIPTION AND OPERATION

4.1 PROCESS DESCRIPTION

The by-product recovery operations for tar and flushing liquor at Bethlehem Steel Corporation, Bethlehem, Pennsylvania are two separate systems; Batteries 2, 3, and A as well as a separate system for Battery 5. These gas streams combine before entering the ammonia saturator. Batteries 2 and 3 have 102 ovens each and were constructed in 1941-43 using a Koppers-Becker design. Battery A has 80 McKee-Otto ovens that began operation in 1976. Batteries 2 and 3 produce a heavy tar because the hot top of the oven causes cracking of the carbon compounds in the coke oven gas. The specific gravity of the heavy tar is in the range of 1.25. Battery 5 has 80 Koppers ovens with horizontal flues that were constructed in 1953. Battery 5 produces light tar with a specific gravity of approximately 1.19.

The processes used at the Bethlehem plant for coke oven gas recovery are primary cooling, tar decanting, exhausting, tar electrostatic precipitation, ammonia still and saturator, final cooling, light oil scrubbing and rectifying, and Sulfiban desulfurization with Claus recovery. A process flow diagram of the gas and liquid streams is depicted in Figure 4-1.

The gas leaving the ovens is collected in the collecting mains where it is sprayed with flushing liquor. The gas and flushing liquor leave the battery area and are transported from the collecting main through cross-over mains into the suction main and into the by-product recovery area. The gas and liquor initially separate at the downcomer where the flushing liquor falls out and the gas continues to the primary coolers. The flushing liquor from Batteries 2 and 3 enters an interceptor pit before being pumped to the



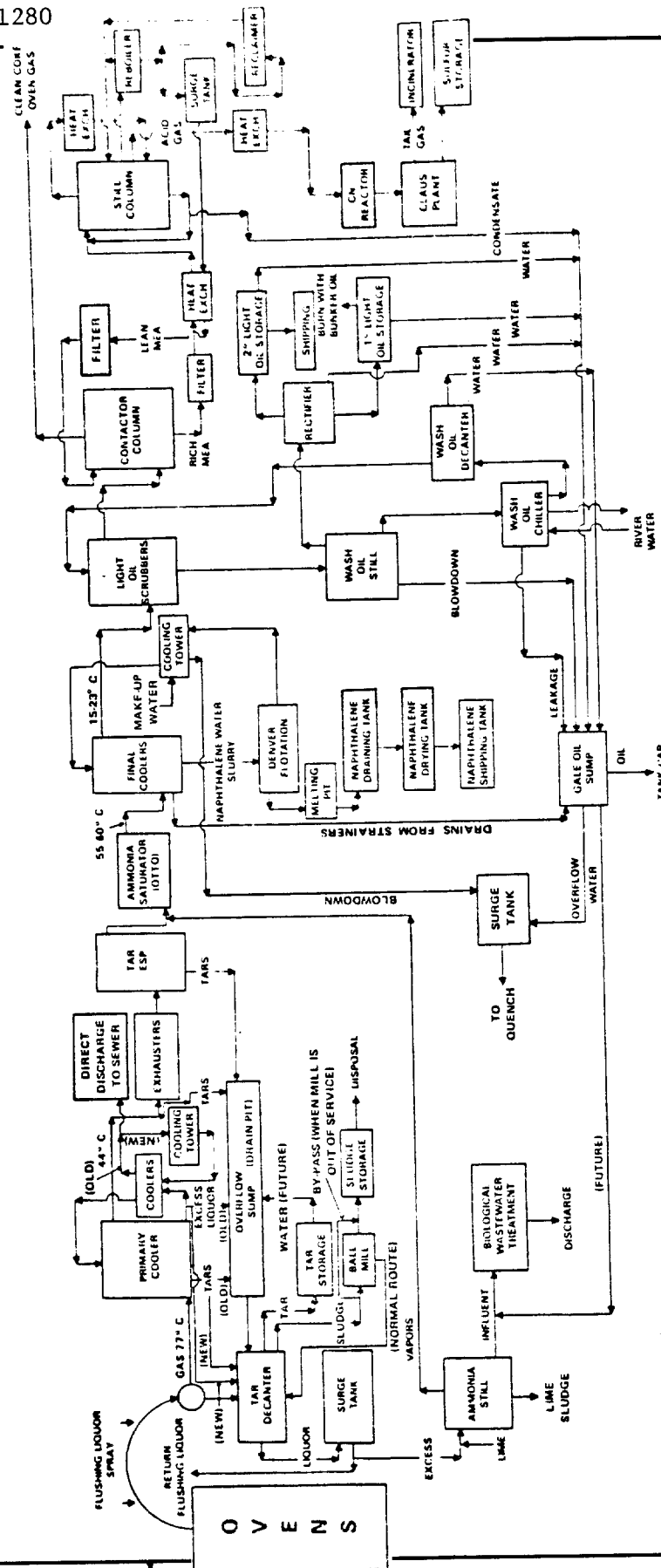


FIGURE 4-1 BETHLEHEM STEEL CORPORATION, BETHLEHEM, PA

tar decanter because ground elevations will not allow for gravity flow. The interceptor pit removes some sludge which is stored in a dumpster before disposal. The detention time in the interceptor pit is very short with a flow rate of 189 l/s (3000 gpm). The flushing liquor from Battery A does not enter this pit, but flows by gravity to the tar decanter.

As previously stated the tar and flushing liquor operations are two separate, but similar systems. This discussion will address the operations for Batteries 2, 3 and A because the plant tour surveyed this system. The gas stream from Battery 5 joins the gas stream from Batteries 2, 3 and A before the ammonia saturator. Excess flushing liquor from both systems are steam stripped in the same ammonia still.

The dirty flushing liquor enters the two parallel tar decanters where it is separated into liquor, tar, and sludge. Liquor from the overflow pit is also separated in the tar decanters. The flushing liquor flows by gravity to a surge tank before returning to the spray system on the collecting mains. Excess flushing liquor from the surge tank is treated with lime before stripping in the ammonia still. The flushing liquor ammonia concentration is approximately 3000 mg/l before the still. The ammonia rich vapors exit at the top of the ammonia still and combine with the main gas stream before the ammonia saturator. The ammonia concentration in the effluent from the ammonia still is 1.2 mg/l before entering the aeration basins. In the future the plant will increase the ammonia concentration to approximately 40 mg/l to enhance the biological wastewater treatment process.



The tar layer from the tar decanter is pumped to tar storage. The water content of the tar is approximately 10-12% from the tar decanter and 3-4% after tar storage. The water content of the tar from the tar decanter could increase to approximately 35% when charging problems occur. The tar in storage is heated to 94°C for several days before shipping. Heavy tar from Batteries 2, 3, and A is produced at a rate of 181.7 cubic meters (48,000 gallons) per day. Light tar from Battery 5 is produced at a rate of 45.4 cubic meters (12,000 gallons) per day. The sludge layer from the tar decanter is pulverized in a ball mill before storage and disposal.

The gas stream enters four parallel primary coolers at 77°C where it is sprayed with circulating liquor. During the visit two old primary coolers were not operating due to reactivation. The circulating liquor is cooled by indirect coolers before recirculating in the primary coolers. Excess circulating liquor and tars are drained to the overflow sump from the old primary coolers. The excess liquor from the new primary coolers goes directly to the decanters. The gas leaves the primary coolers at approximately 44°C.

The gas stream enters the exhausters where the prime motive power for the system is supplied. The gas then enters four parallel tar electrostatic precipitators where additional tar is removed from the gas and drained to the overflow pit (drain pit).

The gas from the tar electrostatic precipitators is combined with the gas stream from Battery 5 and the vapors from the ammonia still before entering the ammonia saturator. The ammonia saturator is an Otto design that sprays 2% sulfuric acid through the gas as it rises in the saturator



column. The system produces 65.3 metric tons (72 tons) of ammonium sulfate per day. Before the ammonia still was installed the plant produced 54.4 metric tons (60 tons) of ammonium sulfate per day.

The gas leaving the ammonia saturator is approximately 55-60°C before entering the final coolers. The final coolers are arranged in three parallel rows with two rows having two coolers each in series and one row having one cooler. There is normally one cooler in each row in service at any given time. The final coolers circulate water which is indirectly cooled before respray. The naphthalene/water slurry from the bottom of the final coolers is conveyed to a Denver flotation unit via an open trough. In the Denver unit the naphthalene slurry is floated and scraped from the surface and then drained to a melting pit. The naphthalene slurry is heated in the melting pit before pumping to the draining tank. From the draining tank the naphthalene goes to a drying tank and then to a shipping tank. The water from the Denver flotation is pumped to the atmospheric cooling tower for the final coolers. All operations are vented to the atmosphere.

The gas leaves the final coolers and enters the light oil scrubbers at 18°C in the winter but rises as high as 32°C in the summer. The wash oil scrubbers are arranged in three parallel rows with two rows having four scrubbers each in series and one row having two scrubbers in series. In the light oil scrubbers the wash oil flows are countercurrent to the gas stream and remove the light oil from the gas stream. The benzolyzed wash oil is then stripped of the light oil in the wash oil still. The debenzolyzed wash oil from the wash oil still is indirectly cooled in the wash oil chillers



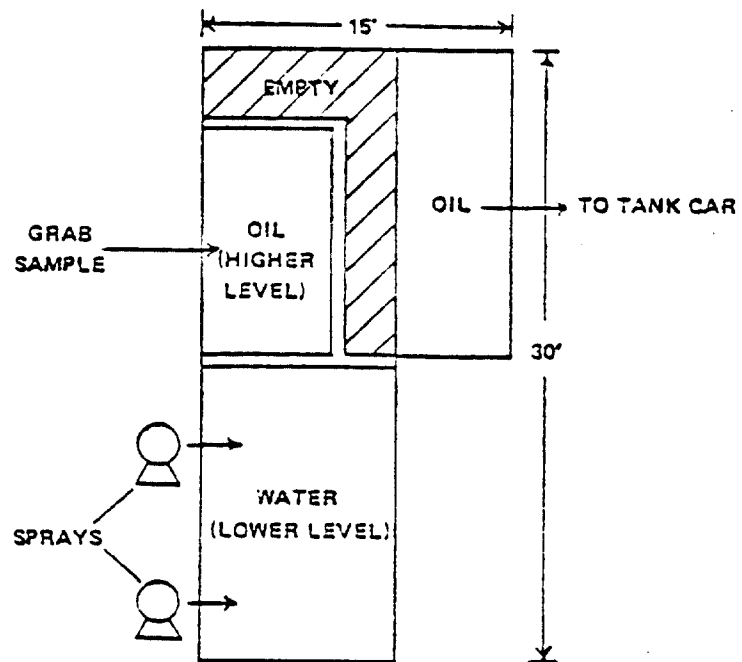
before the wash oil decanter. In the wash oil decanter entrained water is periodically separated from the wash oil and flows by gravity to the Gale oil sump (see Figure 4-2). The wash oil from the wash oil decanter is then returned to the light oil scrubbers for reuse.

The light oil vapors from the wash oil still enter a rectifier which fractionates the light oil into primary and secondary oil. The separation between primary and secondary oil occurs at 140°C (284°F). The crude secondary oil is the BTX fraction of the light oil and is shipped to the Sparrows Point plant operated by Bethlehem Steel Corporation for further refining. The primary oil is the heavy fraction of the light oil and is burned with bunker oil throughout the plant. The plant in the past has refined the secondary crude oil, but in the fall of 1977 the unit was mothballed. The refining operations produced a caustic and acid sludge at 3.8 cubic meters (10,000 gallons) per day each and cost for the ultimate disposal of these sludges made the refining operation economically impractical.

The Gale oil sump receives waste stream inputs from the final cooler, wash oil still, wash oil chiller, wash oil decanter, rectifier, primary light oil storage, secondary light oil storage, desulfurization blowdown or condensate, and miscellaneous runoffs. The Gale oil sump separates the wastewaters into oil and water layers. In the future the water layer will be pumped to the influent to the aeration basins. The oil layer is pumped to a tank car. If the Gale oil sump receives excessive inputs the overflow flows to quench.

The gas stream from the light oil scrubbers then enters the Sulfiban desulfurization process. The gas stream initially enters two





packed contact columns for absorption of the sulfur and the "sweet" coke oven gas exits the top of the contact columns for reuse. The absorbing solution is 15% monoethanolamine (MEA) in water. The rich MEA is stripped in the still column to lean MEA which is returned to the contactor columns. In the still column the acid gases exit the top and are passed through a heat exchanger before entering the cyanide destructor. Some of the condensate or reflux from the still column condenser and heat exchanger are pumped to the Gale oil sump. The acid gases enter the cyanide reactor at approximately 149°C (300°F) and the cyanide is destroyed by heating to approximately 233°C (450°F) with the aid of bauxite and activated alumina catalyst bed. The acid gases leaving the cyanide reactor are then processed in a Claus sulfur recovery system which produces elemental sulfur and incinerates the tail gas.

The sweet coke oven gas after the contactor columns is held at 25 inches of water by a system that supplies natural gas at 23 inches of water and flares at 27 inches of water. The coke oven gas is used at the coke ovens and at other places within the steel mill. The heat value of the gas is approximately 530 Btu per cubic foot.

4.2 PROCESS OPERATING PARAMETERS

During the two-week test period, the plant average coke production rate was 3,900 tons per day. This resulted in generation, on the average, of 78×10^6 cubic feet of raw coke gas per day. Thus, we can state that the plant was operating at about 75% capacity. This capacity factor was discussed with Bethlehem personnel. While it was acknowledged that some



variations result from the longer coking cycles, there is no reason to believe that the benzene emissions, per ton of coke produced, would be significantly different from when the plant is at full capacity.

Other process operating data are presented in Table 4-1.



TABLE 4-1

PROCESS DATA, BETHLEHEM STEEL CORP., BETHLEHEM, PA
Weeks of July 7 and 14, 1980

July Date	Oven Flue Temperatures (Avg., °F)				Coke Production (TPD)		Breeze
	Batt. A	2	3	5	Batt. 5	Total	
7	2,409	2,256	2,230	2,262	710	3,995	101
8	2,410	2,260	2,220	2,252	745	4,098	101
9	2,413	2,247	2,238	2,240	725	3,828	101
10	2,415	2,235	2,236	2,240	720	4,074	101
11	2,384	2,234	2,199	2,251	740	3,928	101
14	2,411	2,250	2,272	2,269	704	3,974	182
15	2,390	2,240	2,234	2,256	657	3,718	151
16	2,383	2,233	2,236	2,263	688	3,567	151
17	2,380	2,232	2,221	2,246	707	3,887	151

July Date	Coke-Oven Gas (MSCF)	Tar (GPD)	Light Oil (GPD)	Primary Oil (GPD)	Naphthalene (GPD)
7	80,170	60,093	26,500	1,032	600
8	78,630	66,896	10,500	1,000	500
9	77,070	31,365	17,700	766	700
10	80,840	42,911	12,500	1,400	900
11	77,170	45,338	15,100	2,500	800
14	77,820	37,403	11,000	1,100	1,200
15	78,200	47,900	10,000	1,000	700
16	73,820	45,200	10,000	1,000	500
17	74,600	44,263	9,000	3,500	800



5.0 FIELD SAMPLING AND ANALYSIS METHODOLOGY

5.1 DETERMINATION OF BENZENE FROM STATIONARY SOURCES: EPA METHOD 110 AND MODIFICATIONS

EPA Method 110 consists of drawing a time-integrated stack gas sample through a probe into a Tedlar* sample bag, which is enclosed in a leak-free drum, by use of a pump hooked to the drum outlet which slowly evacuates the drum, causing the bag to fill. A copy of the method is included in Appendix D.

The method was modified by Scott because as it stands the method doesn't account for moisture in the sample stream, and is only designed to measure benzene concentration, not mass emission rate. The following modifications were made to all tests done using Method 110:

1. To obtain mass emission rates, velocity and temperature readings were taken at the top of the stack at 5 minute intervals during the 30-minute sampling runs. This information was used to calculate flow-rate, which was used in conjunction with the benzene concentration to yield the mass emission rate. Velocity readings were made using a vane anemometer with direct electronic readout.

2. A personnel sampling pump was substituted for the pump, needle valve, and flowmeter of the method. The personnel pumps have built-in flowmeters and rate adjustment screws and have the further advantage of being intrinsically safe, as required in many areas of the coke plant.

* Mention of trade names or specific products does not constitute endorsement by the U.S. Environmental Protection Agency.



3. Swagelok fittings were used in place of quick-connects.
4. Rather than discarding Teflon sample lines after each set of samples, they were washed with propylene carbonate and/or acetone and flushed with nitrogen before reuse.
5. An orifice and magnehelic gauge were inserted in the sampling line before the Tedlar bag to indicate that air flow was reaching the bag.
6. A water knockout trap was inserted between the probe and magnehelic gauge to collect any condensate in the sample line.
7. The following cleanup procedures were followed:

If any condensate was collected in the trap or sample line, it was measured and saved for analysis. The probe, line and trap were then washed with propylene carbonate, which was also saved for analysis. Any benzene found in these washes and water catches was added to the total found in the sample bag to determine mass emission rates.

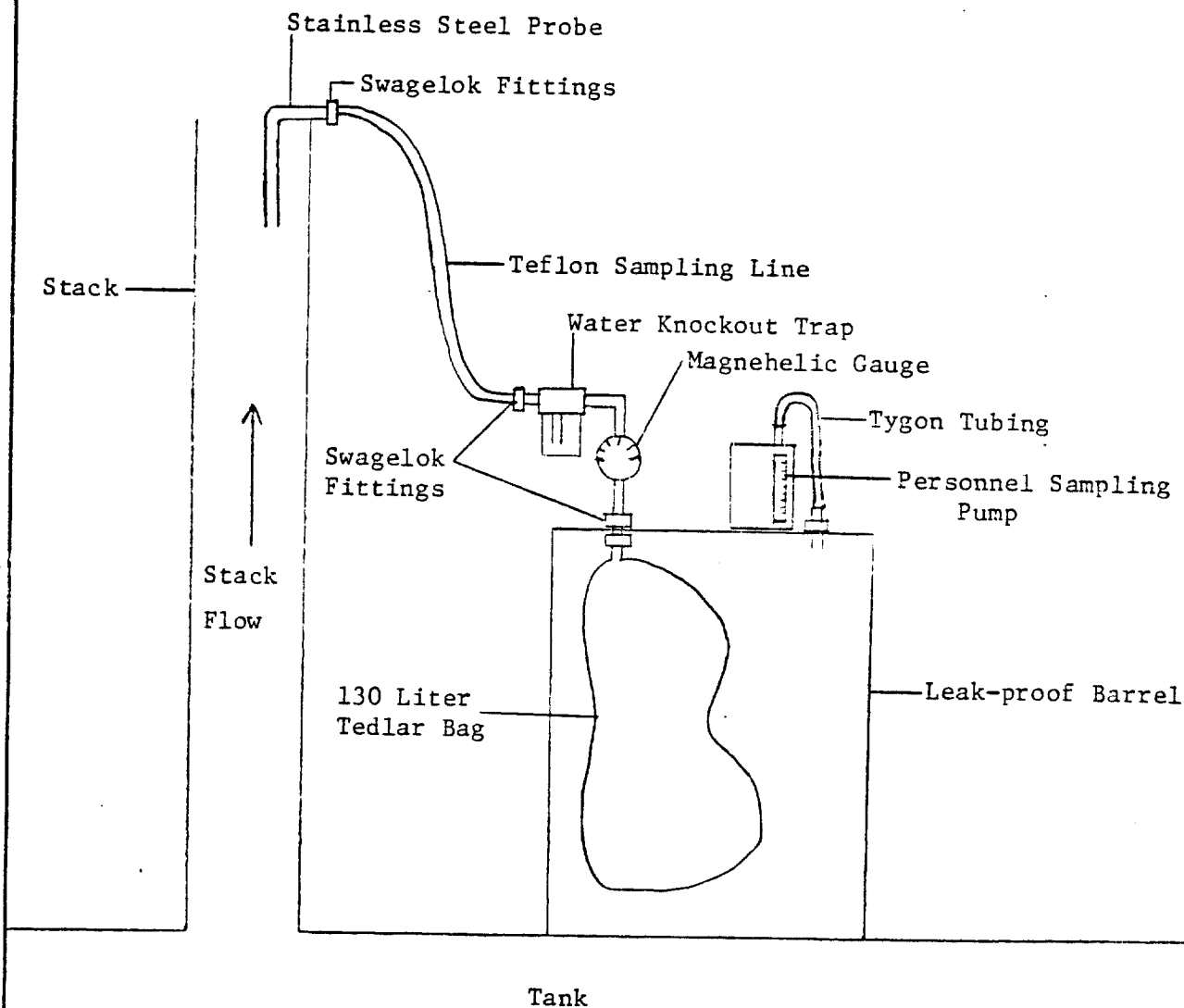
Bag volumes were measured whenever water was collected in the trap by emptying the bag through a dry gas meter after the sample was analyzed. The volume of water collected in the trap was then converted to an equivalent air volume and was added to the volume in the bag to determine the percent moisture in the sample stream.

After the probe, line and trap washes were completed, the lines were washed with acetone to remove the propylene carbonate film and flushed with nitrogen to dry.

Figure 5-1 shows the modified Method 110 setup.



FIGURE 5-1

**Scott**Environmental
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MODIFIED METHOD 110 SAMPLING TRAIN

5.2 TRACER TESTING

The tracer gas method is a practical procedure for quantifying mass emissions of volatile organics from sources which are essentially open to the atmosphere without disturbing flow, dispersion patterns or the source operation. This method utilizes the release of a tracer gas directly over the source of interest; the tracer gas will then follow the same dispersion patterns as the emissions from the source. The mass of tracer released over the sampling period is known and the mass to mass ratio of benzene to the tracer gas in the sample is determined by gas chromatography. The emission rate of benzene can be calculated with this information.

This method is based on the principle that the chosen tracer gas will model the dispersion of benzene from the source. The tracer gas chosen for this project was isobutane because it was not present in the sources to be tested and it could readily be separated from other source trace components by the same column used for benzene. In addition, isobutane is a non-toxic gas that can readily be dispensed from a pressurized cylinder at a uniform measured rate.

When this method was used triplicate tests were performed. Each test consisted of two 1/2 hour runs. For each run clean and backgrounded ten-liter Tedlar bags were used. Integrated samples were collected using Emission Measurements, Inc. Air Quality Sampler II systems. The AQS II samplers are self-contained units capable of collecting one or more integrated samples at a preset rate. For tracer tests the sampling rate used was ten liters per hour.

5.3 SAMPLE HANDLING

After being collected the gas samples were immediately transported to the gas chromatograph and analyzed. The elapsed time between sample collection and analysis never exceeded one hour. To verify that there was no sample degradation in samples of this type some of the samples were retained for 24 hours and reanalyzed. The loss of benzene and isobutane observed was typically less than 5%.



5.4 FIELD ANALYSIS

All gas samples collected were analyzed using a Shimadzu GC Mini 1 gas chromatograph equipped with dual flame ionization detectors, dual electrometers, heated sample loop and a backflush system. Figure 5-2 shows a schematic of the backflush apparatus. The backflush system is composed of ten port sequence reversal valve and two columns, a scrubber column for retaining high molecular weight compounds and an analytical column. When the system is in the inject mode the scrubber column and the analytical column are connected in series allowing sample components to move from the precolumn to the analytical column. In the backflush mode the columns are disconnected from each other and become two separate systems each with its own carrier gas source. This arrangement allows the separation and measurement of low molecular weight compounds while the scrubber column is being backflushed of heavier sample components. Backflush times for different mixtures of sample components must be predetermined to insure that the compound(s) of interest are transferred to the analytical column before backflushing is started.

Samples for chromatographic analysis were drawn into a 20 cc glass syringe then introduced to the sample loop inlet. The samples once in the sample loop were allowed to come to atmospheric pressure by waiting 15 seconds prior to the injection. When only benzene was of interest the following chromatographic conditions were maintained:

Column Temperature (isothermal)	- 100°C
Injector and Detector Temperature	- 200°C
5 ml Sample Loop, Temperature	- 50°C
Carrier Gas Flow Rate	- 32 cc/min
Hydrogen Flow Rate	- 40 cc/min.
Air Flow Rate	- 240 cc/min.
Analysis Time	- 5 min.
Detector	- Flame Ionization



The columns used for field analysis were:

A - Scrubber Column

10% FFAP on Supelcoport 80/100
1/8" x 1 m Stainless Steel

B - Analytical column

20% SP-2100, 0.1% Carbowax 1500
100/120 Supelcoport
1/8" x 10' Stainless Steel

When samples from tracer tests were analyzed the chromatographic conditions were changed to provide adequate separation of the isobutane tracer from the other light components of the sample. The temperature program used for this analysis was:

- 1) Start at room temperature with external cooling fan on and oven door open.
- 2) Inject @ 0.0 min.
- 3) Turn external cooling fan off @ 1.0 min.
- 4) Backflush @ 1.3 min.
- 5) Isobutane elutes @ 2.3 min.
- 6) Close oven door @ 3.0 min. with oven temperature set at 100°C.
- 7) Benzene elutes @ 7.0 min.
- 8) After the elution of benzene, open the oven door and turn on the cooling fan. The next injection can be made after 2 minutes of cooling.
- 9) When the tracer gas is used analysis time will be approximately 10 minutes.

The columns and flow rates were the same as for isothermal.



6.0 FIELD SAMPLING PROCEDURES

6.1 COOLING TOWER-DIRECT WATER FINAL COOLER

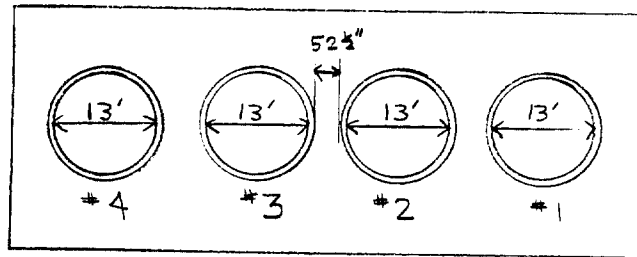
The cooling tower was sampled on July 10, 1980. The tower has four 13-foot diameter fans on top as shown in Figure 6-1. Sampling was conducted at only one fan and the results were multiplied by four to obtain mass emission rates from the whole cooling tower. This approach is expected to yield accurate emissions data without the necessity of testing at all four fans, because the fans were operating under identical conditions.

Air sampling was conducted following EPA Method 110 using a 24-point sampling and velocity traverse across two diameters of the fan shroud to obtain an integrated sample. At two minutes per point, each of the three sampling runs lasted 48 minutes.

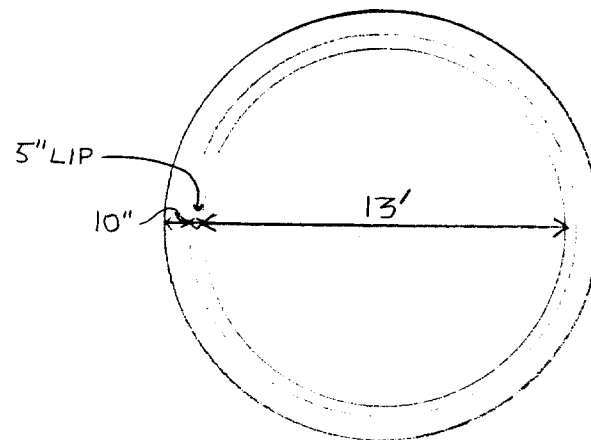
Triplicate liquid samples were dipped from the hot and cold wells with temperatures of 30°C and 27.8°C respectively (86°F and 82°F). At the time of sampling, the cold well was mixing back into the hot well at one location due to a faulty level control. Liquid samples were dipped from points well clear of the mixing area. The plant indicated that average normal operating temperatures for summer are 86°F and 76°F .



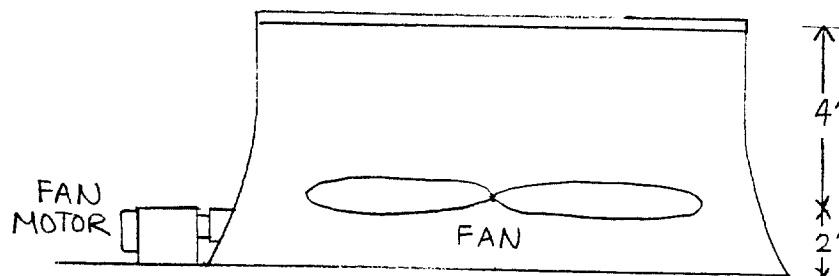
FIGURE 6-1



PLAN VIEW



#2 FAN SHROUD



SIDE VIEW

6.2 TAR DECANter

Three half-hour Method 110 tests were conducted on the tar decanter from the #5 battery on July 8th and 9th, 1980. The tar decanter is shown in Figure 6-2. Problems were encountered with naphthalene plugging the sample line. The decanter was the first source we tested using Method 110, and at the beginning several tests were run in which the sample line clogged without our knowledge resulting in no sample collection.

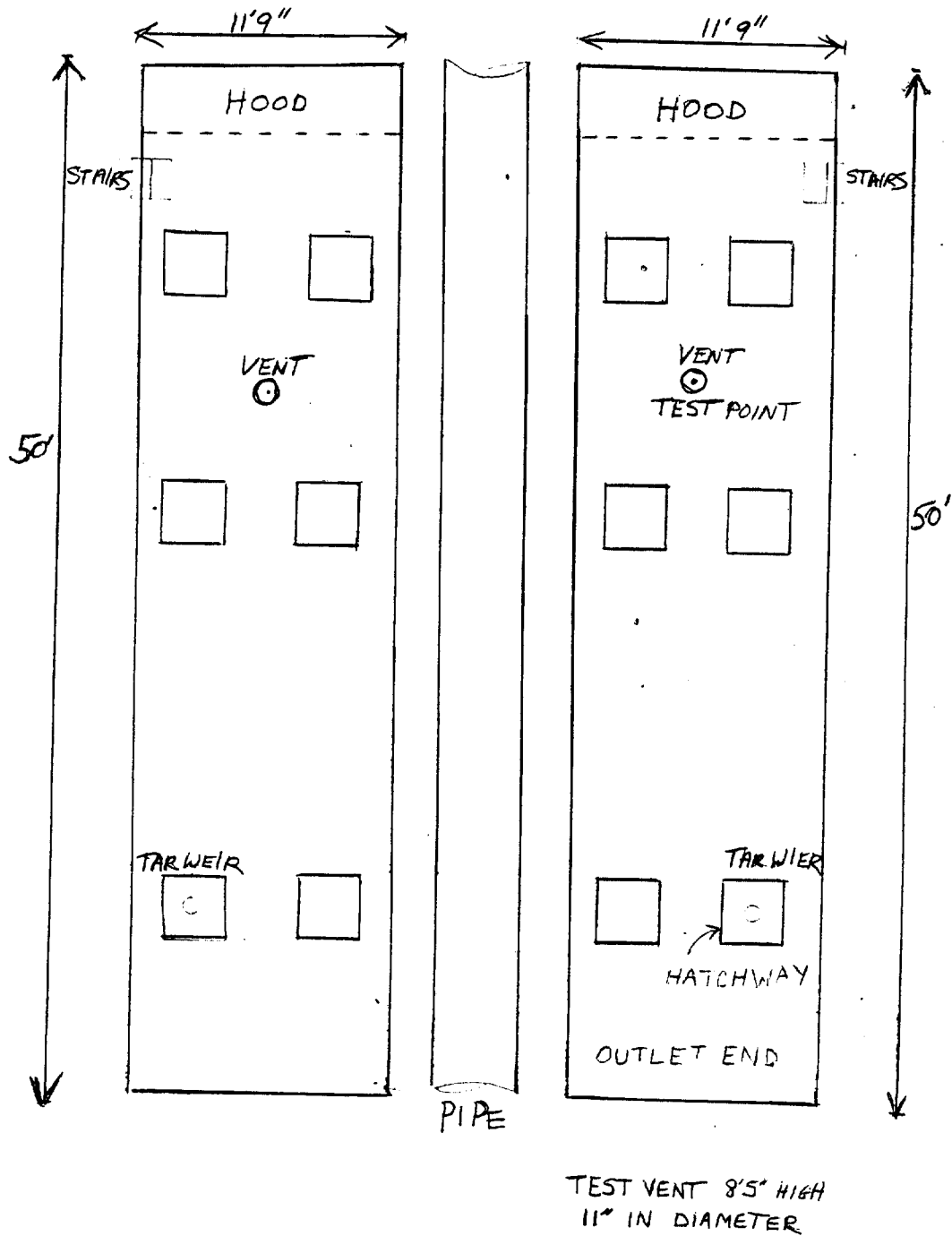
At this point we spent considerable time revising the method for application to this project. The equipment was modified to include an orifice and magnehelic gauge in the sample line to register flow into the bag and a water knockout trap in the line before the orifice to prevent moisture from entering the bag. Clean-up procedures were as described in Section 5.1.

From here on, all tests referred to as Method 110 include these revisions.

The tar decanter receives tar and flushing liquor from the coke gas crossover main from the #5 battery and also from the primary cooler. A total of five liquid samples were collected as follows: Two were dipped from a hatchway on top of the decanter at the outlet end, one was collected from the gas crossover main, and two were taken from the primary cooler outlet.



FIGURE 6-2

**Scott**Environmental
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Inc.BATTERY #5 TAR DECANter
EPA METHOD 110

6.3 LIGHT OIL CONDENSER VENT

Four half-hour EPA Method 110 tests were conducted on the light oil condenser vent on July 11, 1980. The results of the analysis showed the benzene concentration in the third sample to be about half that found in the first two, indicating a possible leak in the system. Upon inspection of the sample line, the leak was found to be caused by an improperly seated gasket in the water knockout trap, and the third run was voided. A fourth test was run, and the analytical results were consistent with those of the first two runs.

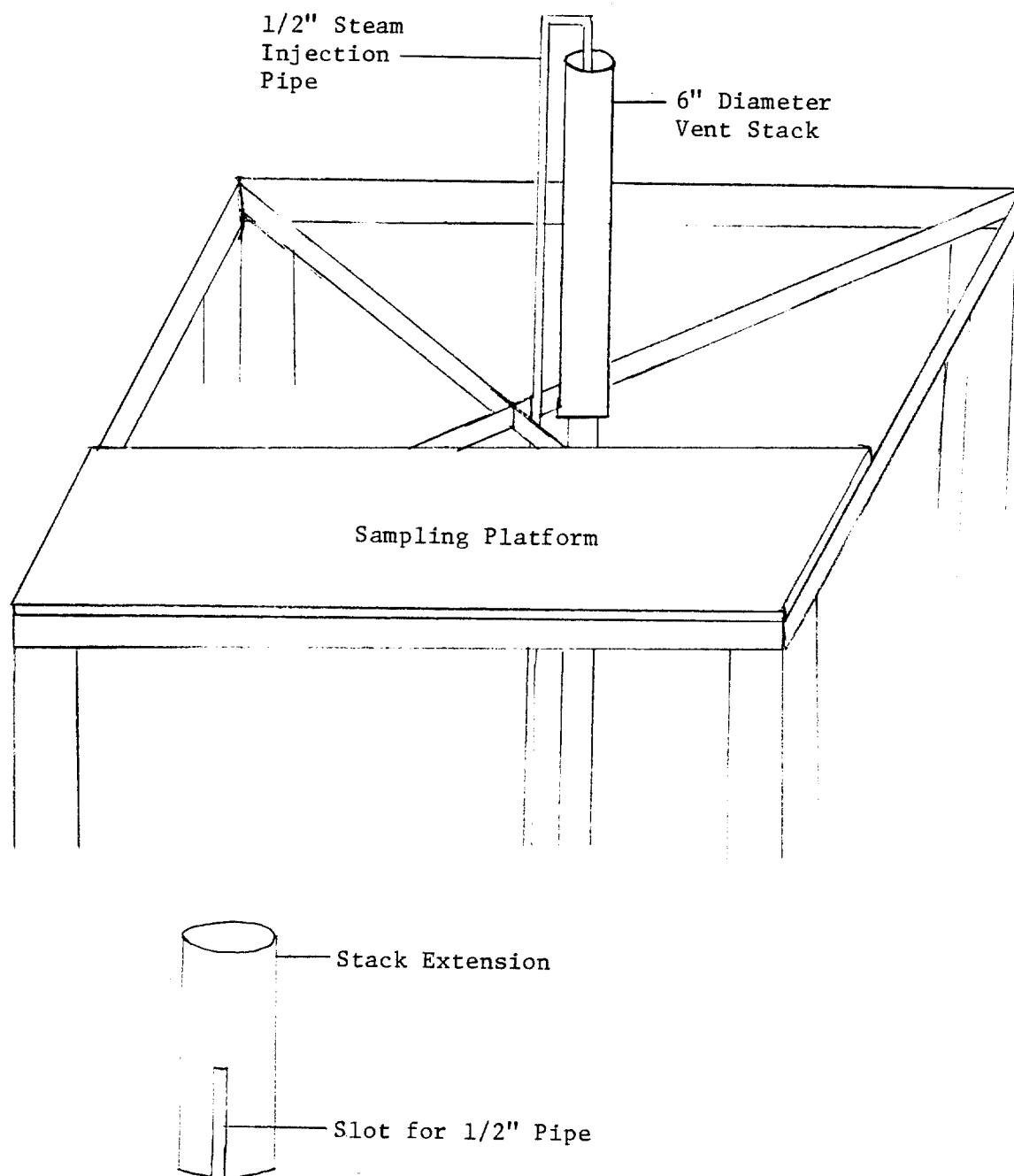
The top of the existing stack had a 1/2 inch steam injection pipe running into the top, as shown in Figure 6-3. A stack extension was constructed from a section of steel stovepipe that extended the top of the stack past the steam pipe so we could accurately measure flow rate with a vane anemometer.

The plant maintenance crew provided scaffolding for access to the testing site.

No liquid samples were collected at this source.



FIGURE 6-3



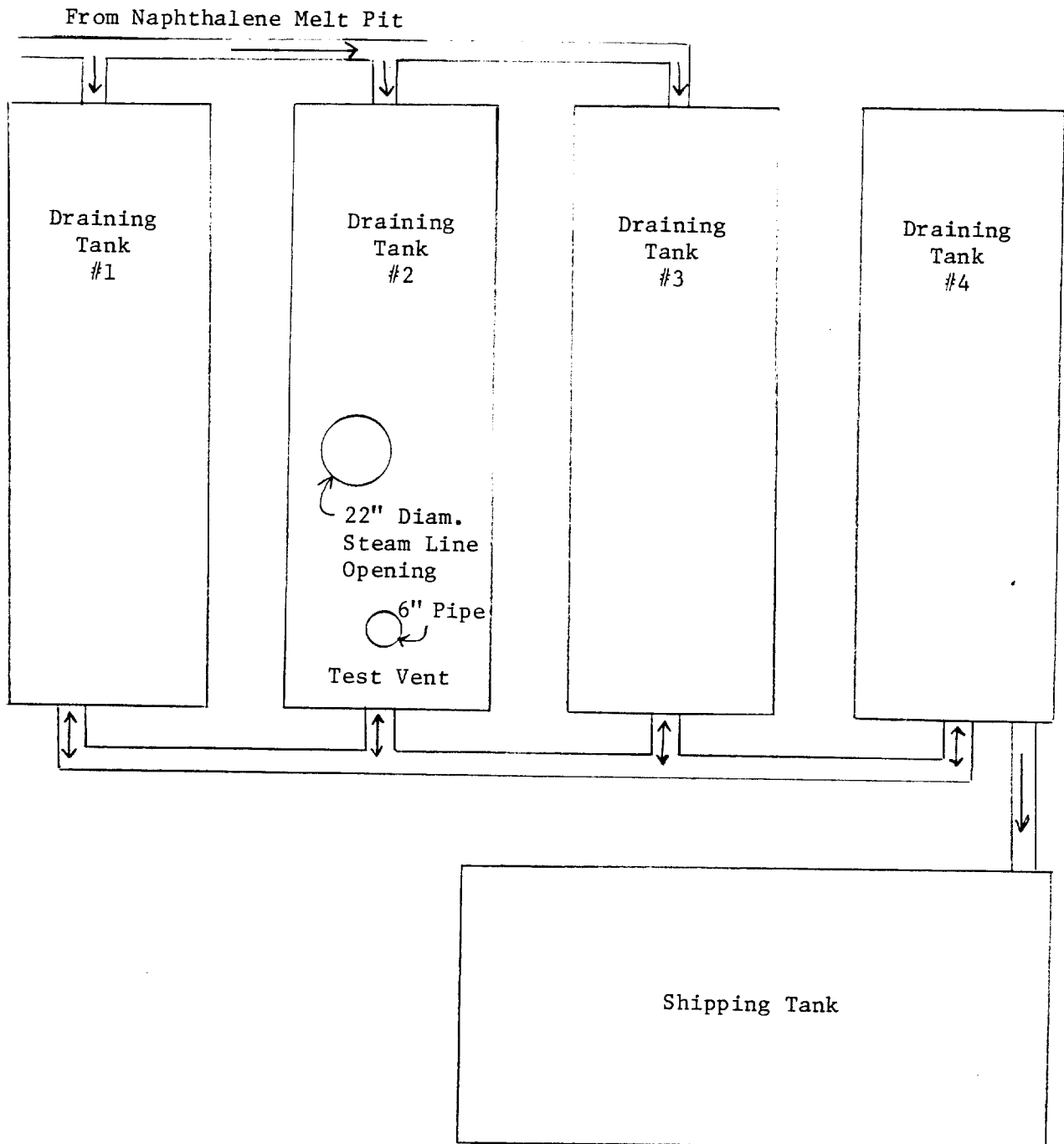
6.4 NAPHTHALENE DRYING TANK

The naphthalene drying tank presented several new problems in sampling strategy. The tank is shown in Figure 6-4 as Draining Tank #2. There is a large opening in the center of the tank with steam lines running in, in addition to a tall 6-inch diameter vent stack located at the end of the tank. More emissions come from the large opening than from the vent, and an attempt was made to cover the opening with plywood and fiberglass packing, but due to the pipes in the opening this was not very successful in stopping leaks. It was decided to construct a sheet metal collar around the opening, with slots to fit around the steam lines, and treat it as a vent stack. Method 110 samples were collected from the tall vent stack and velocity readings were taken at both the stack and the big vent opening. The assumption was made that the concentration of benzene is the same at the big vent opening as it is in the stack. Mass emission rates were therefore determined using the benzene concentration in the stack sample with the flow rates from the stack and the vent opening.

The second major problem encountered was naphthalene plugging the sample line and probe. The line plugged so fast there was no use in cleaning the line periodically. The solution was to bubble the sample stream through propylene carbonate to knock out naphthalene, using a large diameter glass elbow as a probe. A bucket containing three impingers was hooked on top of the stack. The first two



FIGURE 6-4



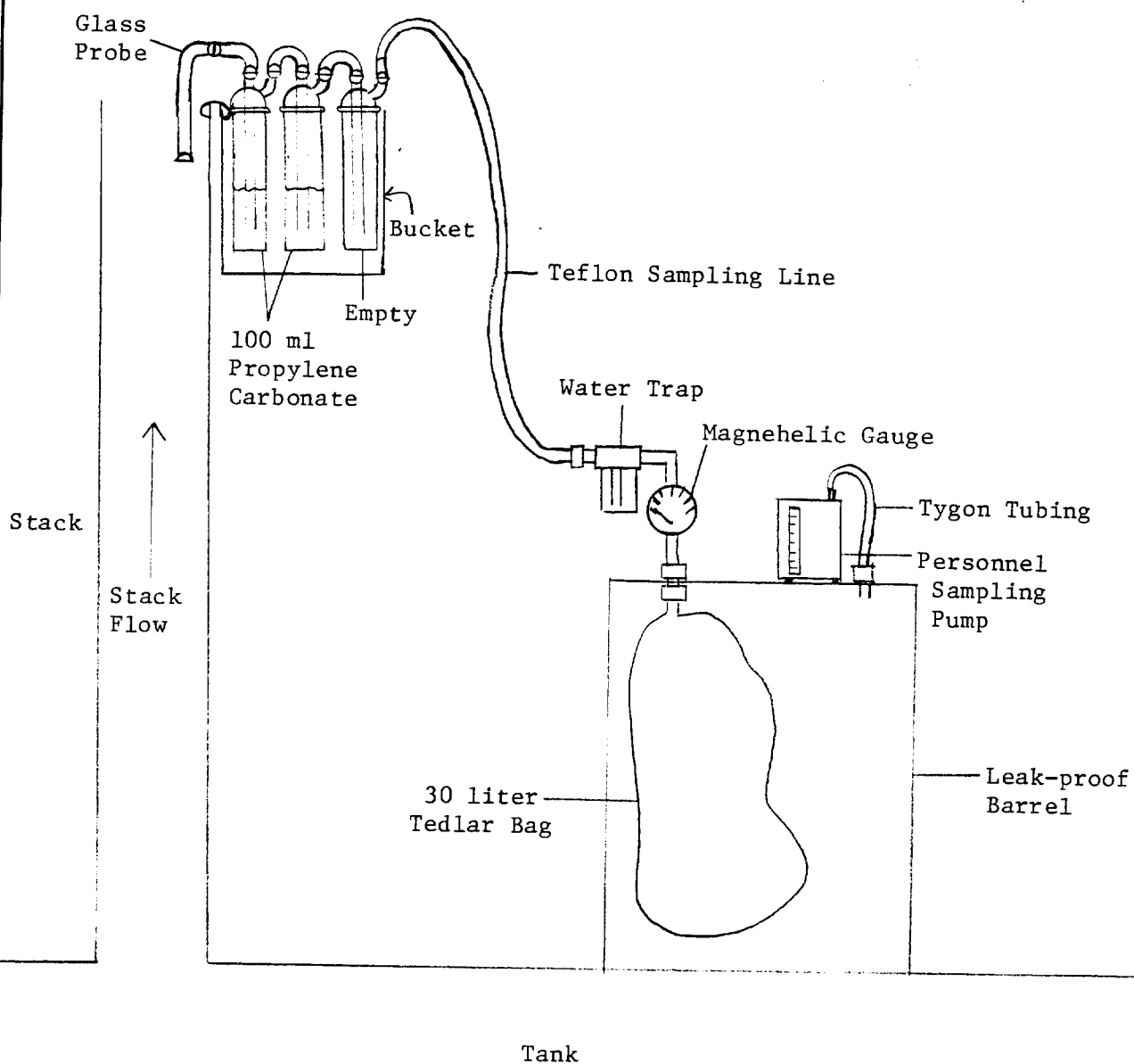
impingers contained 100 ml of propylene carbonate and the third was empty. A Teflon sample line connected the impinger train to the sampling drum and the glass elbow used for the probe was connected directly to the first impinger (See Figure 6-5).

Cleanup consisted of saving the impinger catches and washes in addition to the sample line and water trap washes. The sample volume contained in the Tedlar bag was measured after the sample was analyzed by emptying the bag through a dry gas meter.

A test run was done on the drying tank on July 18 to verify the success of the new procedures. The bag sample collected was analyzed but the propylene carbonate catch was not, as it was just a trial run. Results of the bag analysis are included with the data in Table 3-4 for purposes of comparison. Naphthalene from the melt pit is pumped into a draining tank after the melt each morning, and the tank is steam heated from about 1:00 p.m. until about 4:00 a.m. when a night shift operator shuts it off. Benzene emissions are not expected to be constant over the heating cycle, so in order to measure accurately the emissions from the tank it must be tested over the entire heating cycle. We collected eight half-hour Method 110 tests modified as described at about two hour intervals during the cycle on the night of July 22, 1980.



FIGURE 6-5

**Scott**Environmental
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Inc.MODIFIED METHOD 110 SAMPLING TRAIN WITH PROPYLENE
CARBONATE KNOCKOUT TRAP

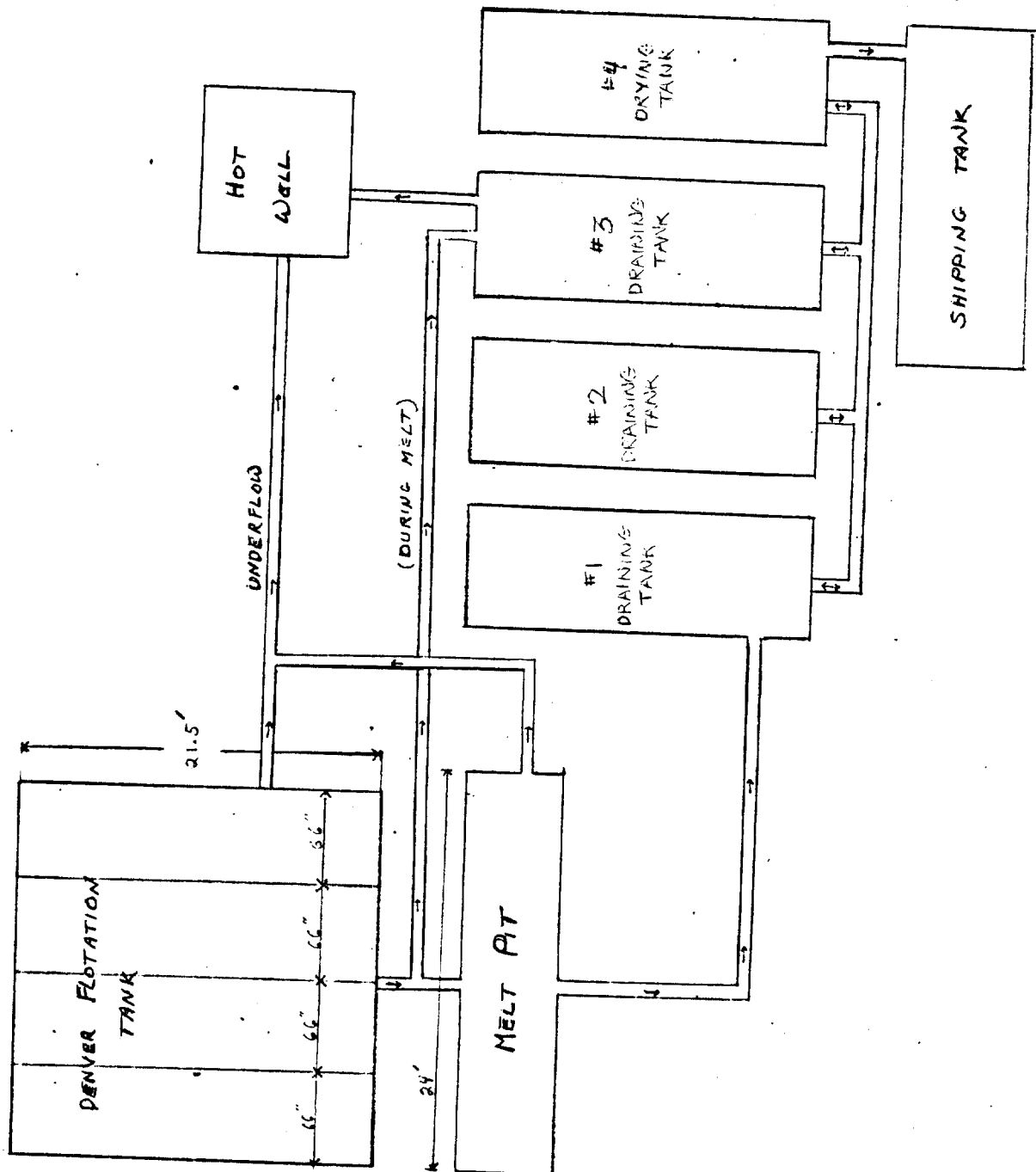
6.5 DENVER FLOAT UNITS

The Denver float unit presented a complex problem to the use of a tracer gas for quantifying the unit's benzene mass emissions. First, there are 4 separate Denver float tanks, of which 3 were normally in use during these tests. The particular tank which was out of service varied from day to day. Second, the naphthalene melt pit was immediately adjacent to the Denver float tanks on one of the sides that was physically accessible for downwind sampling. While the emission rate from the melt pit was low, compared to the Denver float tanks, some "hot spot" points contributed to the downwind samples. For example, the point at which the Denver float overflow trough serving Units 1 and 2 empties its contents into the melt pit was shown to be a "hot spot" for benzene in subsequent grab samples. Figure 6-6 shows the processes and flow directions for the entire naphthalene handling operation. Figure 6-7 shows specifically the Denver float units and the positions of the samplers for the Denver unit tests.

The sampling strategy used was believed to be the best means of arriving at reasonably accurate emission rates without unduly elaborate and costly sampling procedures. The simultaneous use of a different tracer gas at each tank and tests utilizing different tracer gas release configurations would probably have resulted in better confidence in the emission rates during a particular test period. However, the emission rate varies from day to day due to variations in



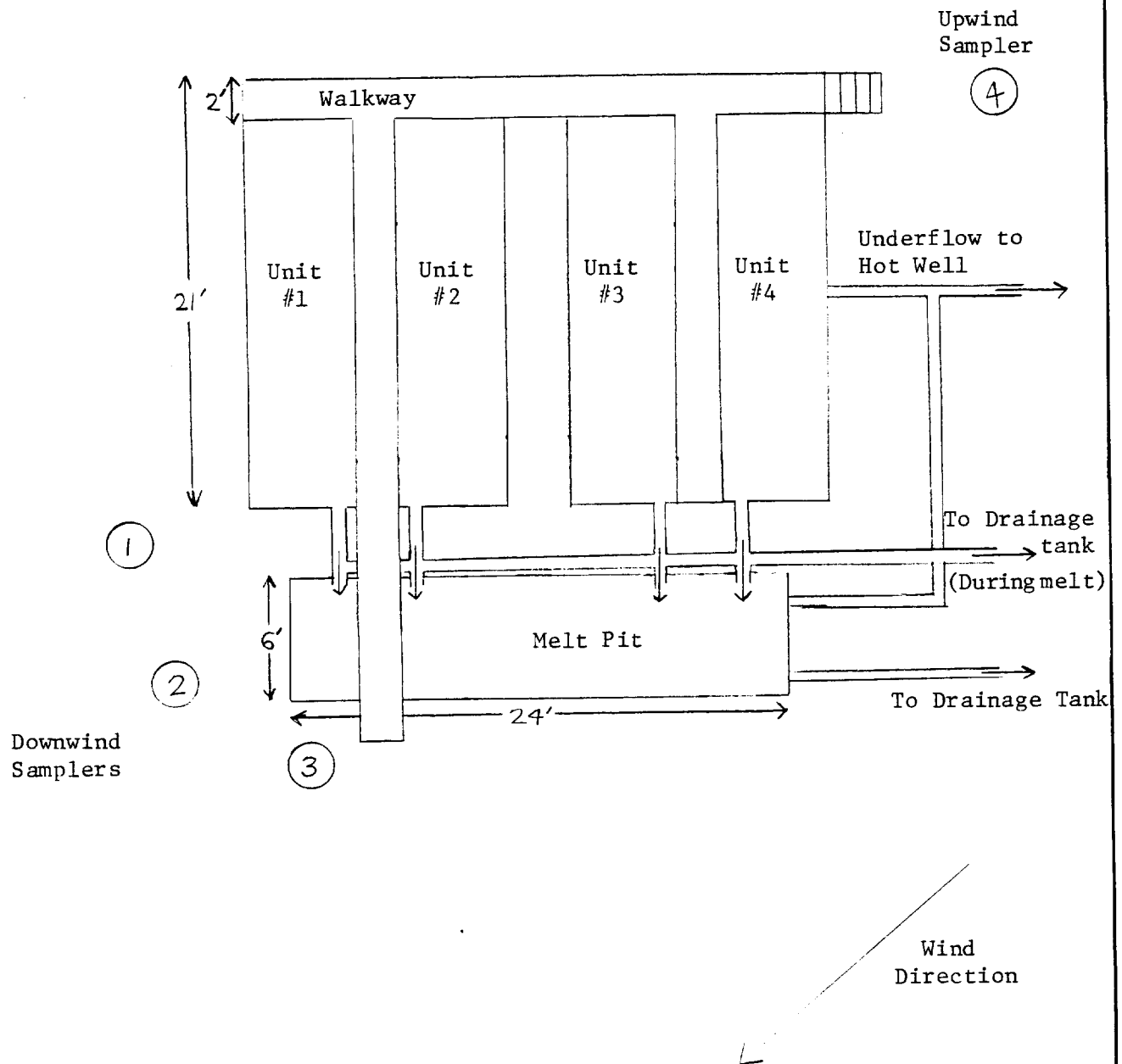
FIGURE 6-6


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 SERIES OF OPERATION: DENVER
FLOTATION UNIT-TO-SHIPPING TANK

FIGURE 6-7



both process and ambient conditions. Thus, it was not cost effective to perform very elaborate test procedures.

The approach used in the Denver float unit tests was to measure the emissions from a single tank. The tracer gas was dispersed onto the surface of this tank with the gas discharge probe located along the center longitudinal point; there will be contributions of benzene from the other two Denver tanks then in use. The relative contribution from the second tank was estimated by releasing the tracer onto the surface of the second tank in a test immediately following the first tank test without changing the position of the samplers. The relative contribution of the two tanks to each sampling location is proportional to the relative amounts of tracer found at that location. There are two assumptions inherent to this conclusion. First, the benzene emission rates from the two tanks are equal. This should be true because the temperature, feed material and size were the same for the two tanks. Second, the diffusion patterns were the same in the two tests. This was demonstrated by comparing the benzene concentrations in each sampler for the two tests.

The sampler locations for Test 1 are shown in Figure 6-7. The isobutane tracer concentrations from the two tests were normalized for differences in isobutane release rate and differences in dispersion. The normalized values were then used to calculate the fraction of the benzene due to emissions from Tank 1. The contribution from Tank 3 was not determined. Because of the additional spacing between Tanks 2 and 3, the contribution ratio of Tank 3 to Tank 2 would be less than



that of Tank 2 to Tank 1. It is believed that Tank 3 contributed less than 5% of the total found in the samples. The calculations shown in Appendix A assume a negligible contribution from Tank 3. The upwind background from distant sources was also assumed to be negligible. The trace benzene concentrations found in the upwind sampler were primarily due to the Denver unit tank emissions swirling during wind shifts. No source was immediately upwind of the Denver unit, and grab samples verified the absence of benzene in the background air mass.

In Tests 2 and 3, the test procedure was the same as in Test 1. However, during Tests 2 and 3, Tank 2 was out of service and thus did not contribute to the benzene found. In Tests 2-2 and 3-1 the tracer gas should have been dispersed over Tank 3 rather than Tank 2 which was out of service. Unfortunately, this was not recognized because this newly developed procedure had not been used before under these circumstances. Tests 2-2 and 3-1 serve as replicates for the benzene concentrations found in Tests 2-1 and 3-2, respectively.

All of the benzene found in Tests 2 and 3 is attributable to Tank 1, since Tank 2 had no emissions, and it is assumed that the Tank 3 contribution to the samplers was negligible as in Test 1.



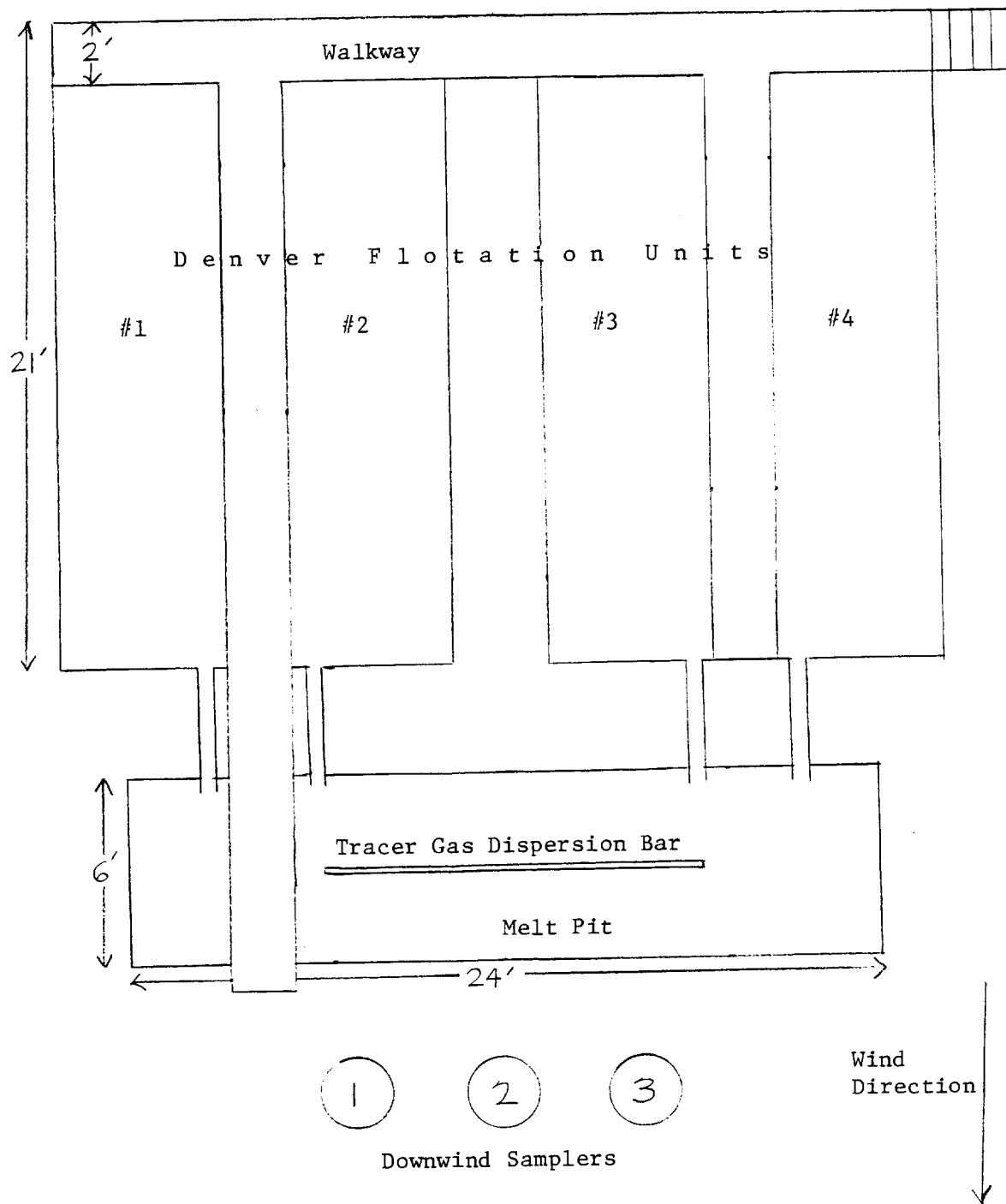
6.6 NAPHTHALENE MELT PIT

The naphthalene melt pit is diagrammed in Figure 6-8. The melt pit is 24 feet long, 6 feet wide and approximately 8 feet below grade. Generally there is one melt cycle per day at the beginning of the first shift. During the melting operation, which lasts approximately one hour or until all the naphthalene is melted, massive emissions of steam and naphthalene are released from the melt pit. These emissions were sufficiently large that small variations in wind speed and direction would not interfere with plume dispersion and the collection of representative samples.

The sampling strategy was to position samplers downwind from the melting process at a distance that would prevent samplers from becoming clogged with naphthalene. Three samplers were placed approximately 10 feet from the edge of the melt pit and were 5 feet apart, an upwind sampler was also positioned approximately 10 feet from the source. At these sampling locations it was assumed that there was no contribution from the Denver float units because the mass and velocity of the plume rising from the melt pit would essentially block emissions from that source from reaching the sampling locations. The gas dispersion bar was positioned on the grating which covered the melt pit approximately 5 feet above the surface of the naphthalene slurry. It is preferable to disperse the tracer at the liquid level of the source but in this case proper safety procedures precluded that arrangement.



FIGURE 6-8



The sampling strategy used was believed to be the best means of arriving at reasonably accurate emission rates without unduly elaborate and costly sampling procedures. The simultaneous use of a different tracer gas at the melt pit and on the Denver float units and tests utilizing different tracer gas release configurations would probably have resulted in better confidence in the emission rates during a particular test period. However, the emission rate varies from day to day due to variations in both process and ambient conditions. This, it was not cost effective to perform very elaborate test procedures.

Between Runs 1 and 2 of Test 2, the dry gas meter was dropped and a leak developed at the rotameter at the exit of the gas meter. This was not detected until after Run 2. As a result, a portion of the tracer gas was released to the air near Sampler 2 instead of through the dispersion probe. Thus, the benzene emission results for Samplers 1 and 3 are somewhat high and that for Sampler 2 is too low. In addition, the leak was after the dry gas meter, so the metered release rate of isobutane was not the rate at which isobutane left the dispersion probe. For these reasons, Test 2, Run 2 was not valid. The results were included in Table 3-6 for comparison of the benzene concentrations measured, which are valid.

Four tests were run on consecutive days. During the first three tests, the wind was from the S to SW and the sampler location was as shown in Figure 6-8. During Test 4, the wind direction was from the north. For this reason sampler positioning for this test was



different than for the first three tests. The samplers were positioned two feet from the melt pit between the melt pit and the Denver units and approximately five feet from the dispersion bar.

After Test 3, a test was performed to measure the emissions present at the sampling locations when a melt cycle was not in progress. The tracer apparatus and samplers were set up as they were for Tests 1, 2 and 3 on the melt pit. During this test the wind was light but steady over the Denver units. The benzene found in these samples could come from the filling melt pit, the feed troughs and from the Denver units. It was believed that the results of this test could be helpful in interpreting the data obtained at the same locations during the melt cycle.



7.0 LABORATORY SAMPLE ANALYSIS

Two types of liquid samples were collected: process liquids, and sample line and water trap catches and washes. All liquid samples were stored in amber glass bottles and returned to Scott's Plumsteadville laboratory for analysis.

7.1 SAMPLE PREPARATION

Depending upon the complexity of the sample, one of the following sample preparation procedures was followed prior to the "purge and trap" procedure and analysis.

Samples Containing Immiscible Liquid Phases

Using a clinical centrifuge (International Equipment Company, Massachusetts) immiscible liquid phases were separated and each phase was analyzed separately for benzene.

Samples Containing Solid and Immiscible Liquid Phases

Samples containing solids of higher density than the liquid phase were separated by centrifuge or by simple decantation of the liquid. The different phases in the liquid fraction were then further separated by centrifuging. Solid and liquid phases were analyzed separately.

Samples Containing Finely Crystalline Solid Suspension

In analyzing these samples the stoppered sample jars were shaken for at least half an hour for homogenizing the solution. The uniform distribution of suspended fine crystalline solid particles was tested by determining the percentage of dry solid in several aliquots of the homogenized mixture. A weighed amount of the mixture was analyzed for benzene.



Sampling System Washings

All washings were clear solutions having only one liquid phase. The total weight of the liquid phase was determined using a balance correct to ± 0.1 g. The total weight of each washing was more than 25 grams, so an error of 0.1 g in weighing the mass will contribute an error of only 0.4% to the final analytical data. A weighed aliquot of the washing was analyzed for benzene by following the "purge and trap" and analysis procedures outlined in the following sections, and using this analysis data the weight of benzene present in the total mass of washing was calculated.

7.2 PURGE AND TRAP PROCEDURE FOR EXTRACTION OF BENZENE FROM LIQUID PHASE TO GASEOUS PHASE

An accurately weighed quantity of the sample to be analyzed was diluted with 20-25 ml of propylene carbonate in a specially designed glass purging apparatus which was kept immersed in a thermostatted water bath maintained at 78°C. Benzene free nitrogen gas was bubbled through the propylene carbonate solution in the purging apparatus at the rate of 0.2 - 0.3 liters/minute, and collected in leak free Tedlar bags. Under these experimental conditions, 1 1/2 - 2 hours were sufficient to purge off all the benzene from the liquid phase to the gaseous phase. The total volume of nitrogen gas used to purge the sample was accurately measured by a calibrated dry gas meter. A diagram of the purge and trap set-up is shown in Figure 7-1.

Propylene carbonate was found to be an ideal diluting solvent for the extraction of benzene from all types of liquid samples containing viscous tar, pitch, light and heavy oil and insoluble particulates. It was chosen for its high boiling point, low density, and good solvating capacity.



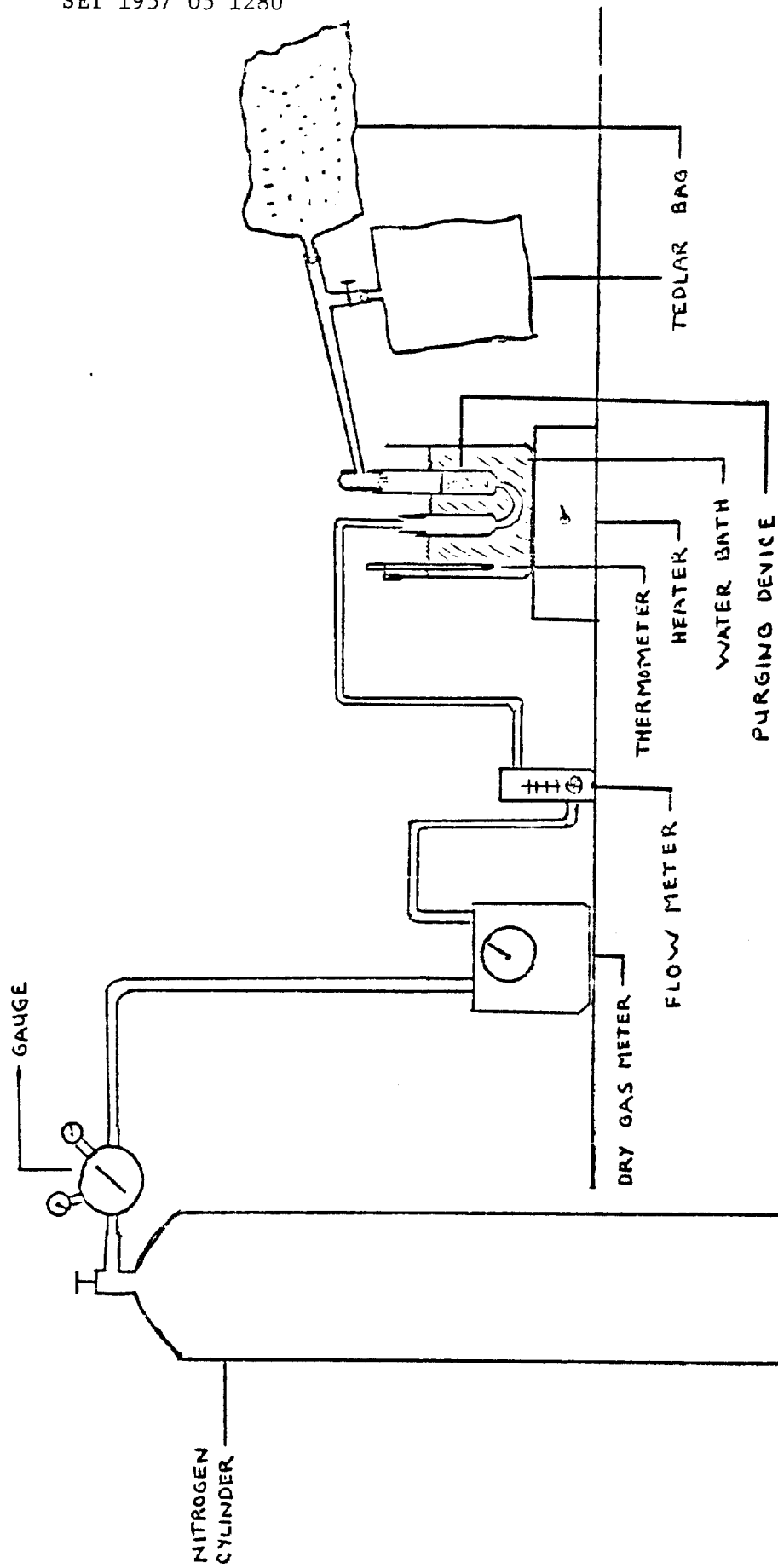


FIGURE 7-1 PURGE AND TRAP METHOD EQUIPMENT SET-UP

7.3 GAS CHROMATOGRAPH

A Perkin-Elmer 900 gas chromatograph was used for the analysis of the purge bags. A 10 ft. by 1/8 inch stainless steel column packed with 20% SP-2100/0.1% Carbowax 1500 on 80/120 mesh Supelcoport was used for the analysis. This column gave complete resolution of the benzene peak from other components present in the purge bags. The 'peak height' method was utilized to calculate the concentration of benzene in the purge bags analyzed. The Perkin-Elmer 900 used for analysis was not equipped with a backflushing unit. Gas chromatograph conditions were as follows:

GC column temperature: 70°C isothermal

Detector temperature: 190°C

5 ml loop at a temperature of 120°C

Carrier gas flow rate: 30 cc/min He

Hydrogen flow rate: 45 cc/min

Oxygen flow rate: 400 cc/min

Detector: Flame Ionization Detector (FID)

In addition to benzene, the purge bags contained other volatile hydrocarbons present in the liquid samples such as toluene and naphthalene. Because this chromatograph was not equipped with a backflush, it was necessary to elute all heavy organics from the column by heating the column to 150°C after every two injections for one hour with the carrier gas on. After cooling the column to 70°C the absence of any organic in the column which might overlap the benzene peak in the next analysis was checked. When the column was found to be satisfactorily clean, the next analysis was continued under the conditions previously described.



8.0 QUALITY CONTROL AND QUALITY ASSURANCE

The following sections will address quality control and quality assurance procedures for the field analysis of benzene in air samples and the laboratory analysis of process liquids.

8.1 FIELD ANALYSIS PROCEDURES

All samples were analyzed in duplicate and as a rule peak heights were reproduced to within 5%. For some very high concentration samples (percent range) it was necessary to make dilutions for analysis. When this was done a fresh dilution was prepared for each injection and peak heights were reproduced to within 10%. To verify that the system was retaining no benzene, frequent injections of the standard and nitrogen were made. In all cases the result was satisfactory.

The Tedlar bags that were reused for sampling were flushed three times with nitrogen and allowed to sit overnight after being filled to approximately three quarters of their capacity. They were analyzed for benzene content the following day. The background concentrations of the bags were recorded and varied from 0 to 10 ppm benzene. Care was taken to use sample bags whose background concentration was very low compared to the expected concentration of the source.

The accuracy and linearity of the gas chromatographic techniques used in this program were tested through the use of EPA Audit Samples. Two standards, a 122.5 ppm and 6.11 ppm benzene were used to analyze the audit cylinders.



8.2 PROCEDURES FOR ANALYSIS OF PROCESS LIQUIDS

Scott's benzene standards, checked against EPA Audit Standards, were used as reference standards throughout this program. The accuracy and linearity of the gas chromatographic technique for benzene analysis was tested through the use of EPA Audit Standards which were available to Scott. Gas chromatographic analysis of the samples and standard were performed under identical conditions to assure the accuracy of the analytical data generated.

Each batch of propylene carbonate which was used as the diluting solvent in the purge and trap technique was analyzed for benzene content by subjecting 25 ml of propylene carbonate to the purge and trap procedure followed by gas chromatographic analysis of the trapped gas under identical conditions as described in Section 5.2. All batches of analytical grade propylene carbonate were found to be free from benzene.

Every day before the analysis of samples the purging apparatus and trapping bags were tested for absence of benzene. Whenever the whole system was found to be free from benzene to the lowest detectable limit of the instrument, the samples were analyzed using the purging apparatus and the trapping gas sampling bags.

Generally an accurately weighed mass of each sample was subjected to purge and trap procedure only once and the trapped gas sample was repeatedly analyzed by GC until the analytical data of consecutive GC analyses varied by $\pm 0.5\%$ or less.



For randomly selected samples, the whole analytical procedure was repeated with a different weighed mass of the source sample to check the validity and accuracy of the analytical methodology. The analytical data for different runs were found not to vary by more than 5%.

By purging the sample with nitrogen under the experimental conditions as utilized by Scott, the recovery of benzene from the sample was quantitative and this has been verified by analyzing a standard benzene solution in propylene carbonate containing tar and pitch.



APPENDIX A
SAMPLE CALCULATIONS



APPENDIX A
SAMPLE CALCULATIONS

1. Tracer Gas Calculations

Example: Naphthalene melt pit, Test 1, Run 1

Concentration of Benzene: 11.48 ppm

Isobutane release rate: 1.16 lb/hr

Calculation of mass to mass ratios:

$$\text{Benzene } 11.48 \text{ ppm} \times 78 \text{ g/mole} = 895.44$$

$$\text{Isobutane } 0.713 \text{ ppm} \times 58 \text{ g/mole} = 41.35$$

$$\frac{895.44}{41.35} \times 1.16 \text{ lb/hr} = 25.12 \text{ lb/hr benzene}$$

2. Flow Rate at Standard Conditions (saturated at 68°F, 29.92 inches Hg)

Example: Naphthalene drying tank, Run 1

A. Correction for temperature and pressure:

$$\text{Flow Rate (STP)} = \text{Flow Rate (source)} = \frac{528^\circ\text{R}}{T(^{\circ}\text{F}) + 460} \times \frac{P_{\text{bar}}(\text{in. Hg})}{29.92}$$

$$\text{Flow Rate (STP)} = 1150 \text{ cfm} \times \frac{528}{209 + 460} \times \frac{29.5}{29.92} = 895$$

B. Correction for moisture

Impinger and water trap catch volume: 76cc

Tedlar bag volume(gas sample): $0.474 \text{ ft}^3 = 13.42 \text{ l}$

Gaseous volume of collected water, standard conditions:

$$76 \text{ cc} \times \frac{1 \text{ gm}}{\text{cc}} \times \frac{1 \text{ mole}}{18 \text{ gm}} \times \frac{24.15 \text{ l}}{\text{mole}} = 101.97 \text{ l}$$



Percent moisture:

$$\frac{101.97}{101.97 + 13.42} = 88.4 \%$$

Flow Rate corrected for moisture:

$$\begin{aligned} \text{Flow Rate (dry)} &= \text{Flow Rate (STP)} \times (100 - \% \text{ Moisture})/100 \\ &= 895 \times (100 - 88.4)/100 \\ &= 104 \text{ cfm} \end{aligned}$$

$$\begin{aligned} \text{Flow Rate (saturated at } 68^{\circ}\text{F)} &= \text{Flow Rate (dry)} \times 1.025 \\ &= 104 \text{ cfm} \times 1.025 \\ &= 106 \text{ cfm} \end{aligned}$$

3. Correcting Benzene Concentration for Benzene Found in Water Trap Catch

Example: Naphthalene drying tank, Run 1

Mg benzene in catch: 1.42 mg

Tedlar bag volume (gas sample): $0.474 \text{ ft}^3 = 13.42 \text{ l}$

Measured benzene concentration: 135.96 ppm

A. Mg benzene in collected gas sample:

$$\frac{135.96}{10^6} \times 13.42 \text{ l} \times \frac{78 \text{ g}}{\text{mole}} \times \frac{1 \text{ mole}}{24.15 \text{ l}} = 5.89 \text{ mg}$$

B. Total mass of benzene (air + liquid)

$$5.89 + 1.42 = 7.31 \text{ mg}$$

C. Corrected benzene concentration:

$$0.00731 \text{ g} \times \frac{1 \text{ mole}}{78 \text{ g}} \times \frac{24.15 \text{ l}}{\text{mole}} \times \frac{10^6}{13.42 \text{ l}} = 168.60 \text{ ppm}$$



4. Calculation of Benzene Mass Emission Rate

Example: Naphthalene drying tank, Run 1

Flow Rate (standard conditions) = 106 cfm

Benzene concentration = 168.60 ppm

$$106 \frac{\text{ft}^3}{\text{min}} \times \frac{28.32 \text{ l}}{\text{ft}^3} \times 60 \frac{\text{min}}{\text{hr}} \times \frac{168.60}{10^6} \times \frac{78 \text{ g}}{\text{mole}} \times \frac{1 \text{ mole}}{24.15 \text{ l}} \times \frac{1 \text{ lb}}{454 \text{ g}} = 0.22 \text{ lg/hr}$$



APPENDIX B
FIELD DATA SHEETS



PROJECT 1922

METHOD 110 DATA SHEET

PLANT: Bethlehem Steel, BethlehemDATE: 7/10/80PROCESS: Cooling tower dw/cAMBIENT TEMPERATURE: 80 °F

PROCESS NOTES:

BAROMETRIC PRESSURE: 29.58

Fan #2

TEDLAR BAG NUMBER: 11

Can #1

POINT

	TIME	STACK TEMP	GAS VELOCITY	PUMP FLOWRATE
1	10:34 0	84 °F	~100 ft/min	1.5 lpm 5748.5
2	2	83 °F	300	1.5 5757
3	4	82 °F	500	5766
4	6	83 °F	1000 ft/min	5775
5	8	82	1200	1.5 5784
6	10	83	450 ft/min	5793
12	12	84	600 ft/min	1.6 5802
11	14	85	950 ft/min	1.5 5811
10	16	86	1050	1.5 5820
9	18	85	1200	1.5 5829
8	20	85	1100	1.5 5838
7	22	84 °F	400	5847
13	11:00 24	83	750 ft/min	1.5 lpm 5855
14	26	83 °F	1100	1.5 5865
15	28	84	1100	1.5 5874
16	30	84	1200	5882
17	32	84	1100	1.5 5890
18	34	84 °F	350 ft/min	5899
24	11:15 36	84	600	1.5 lpm 5908
23	38	84	800	5917
22	40	84	1150	1.5 5926
21	42	84	1250	5935
20	44	84	1300 ft/min	1.5 5943
19	46	85	850	5952
	48			5965
		Sample Col	1.746 c/s	

SCOTT ENVIRONMENTAL TECHNOLOGY, INC.

PROJECT 1922

METHOD 110 DATA SHEET

PLANT: Bethlehem Steel, BethlehemDATE: 7/10/80PROCESS: cooling tower dwfcAMBIENT TEMPERATURE: 83 °F

PROCESS NOTES:

BAROMETRIC PRESSURE: 29.58

diam. 13 ft.

TEDLAR BAG NUMBER: 3

can # 3

POINT	TIME	STACK TEMP	GAS VELOCITY	PUMP FLOWRATE
1	11:50 0	85 °F	~ 650 ft/min	1.5 lpm 5965
2	2	85	400 ft/min	1.5 5974
3	4	85	1000	1.5
4	6	85	1050	
5	8	84	1200	1.5
6	10	84	350 ft/min	
12	12	84	600 ft/min	1.5 lpm
11	14	85	900	
10	16	85	1050	1.5 lpm
9	18	85	1200	
8	20	85	1200	1.5
7	22	84	450	1.5
13	12:17 24	84	700	
14	26	84	1060	1.5
15	28	84	1100	
16	30	83	1200	1.5 lpm
17	32	83	1150	1.5
18	34	83	400	
24	12:30 36	85	500 ft/min	1.5 lpm
23	38	85	900	
22	40	85	1100	
21	42	85	1250	1.5 lpm
20	44	85	1250	
19	46	84	500	1.5
	48	Sample val.	2.069	ft ³

SCOTT ENVIRONMENTAL TECHNOLOGY, INC.

PROJECT 1922

METHOD 110 DATA SHEET

PLANT: Bethlehem Steel, BethlehemDATE: 7/10/80PROCESS: Cooling tower dwfcAMBIENT TEMPERATURE: ~85°F

PROCESS NOTES:

BAROMETRIC PRESSURE: 29.56

13 ft. diameter

TEDLAR BAG NUMBER: 1

Can #1

POINT

	TIME	STACK TEMP	GAS VELOCITY	PUMP FLOWRATE
1	14:17 0	84 °F	450 ft/min	1.5 lpm
2	2	84 °F	850	1.5
3	4	84 °F	1000	1.5
4	6	82	1100	1.5
5	8	83	1000	1.5
6	10	84	250	1.5
12	12	80 °F	100 ft/min	1.5 lpm
11	14	83	400	
10	16	83	400	1.5
9	18	83	1050	
8	20	84	1200	
7	22	83	650	1.5 lpm
13	14:45 24	84	700 ft/min	1.5
14	26	84	950	1.5
15	28	84	1100	1.5
16	30	83	1250	1.5
17	32	83	1150	1.5
18	34	83	300	1.5
24	36	82 °F	500 ft/min	1.5 lpm
23	38	83	900	1.5
22	40	84	1200	1.5
21	42	84	1250	1.5
20	44	84	1250	1.5
19	46	84	700	1.5
	48			

sample vol. 1.744 ft³

PROJECT 1906 BENZENE/BaP PRESURVEY

S A M P L E D A T A

Plant Beth St. Bethlehem Process Cooling tower duct Date 7/10/80

Sample No. CT HotWell 1 Time Sampled 15:40

Sample Type: Liquid Air

Sample Temperature 86 °F

Ambient Temperature 74 °F

Description of Sampling Location: from surface near inlet from Denver unit

Sample No. CT HotWell 2 Time Sampled 15:40

Sample Type: Liquid Air

Sample Temperature 86 °F

Ambient Temperature 74 °F

Description of Sampling Location: same

Sample No. cool well #1, #2 Time Sampled 15:45

Sample Type: Liquid Air

Sample Temperature 82 °F

Ambient Temperature 76 °F

Description of Sampling Location: from cold well, flow from bottom of cooling tower into cold well



Scott Environmental Technology Inc.

PROJECT NUMBER 1922 TEST NUMBER 01PLANT Bethlehem Steel, Bethlehem PADATE 7/10/80SAMPLING LOCATION Cooling tower ductSAMPLE TYPE Method 110RUN NUMBER 1OPERATORS CG, JW, FG

AMBIENT TEMPERATURE _____

BAROMETER _____

WYRITE ANALYSIS

CO₂ O₂ _____FIELD DATA
MOISTURE _____

Initial Meter Reading _____

Final Meter Reading _____

Barometric Pressure _____

Water Temp. In _____

Out _____

Orsatameter Setting _____

Water Volume Final _____

Water Volume Initial _____

Gas Volume _____

Operator _____

COMMENTS _____

Page B-6

DRY MOLECULAR WEIGHT DETERMINATION BY _____

SAMPLING TIME (24-hr CLOCK) _____

SAMPLING LOCATION _____

SAMPLE TYPE (BAG, INTEGRATED, CONTINUOUS) _____

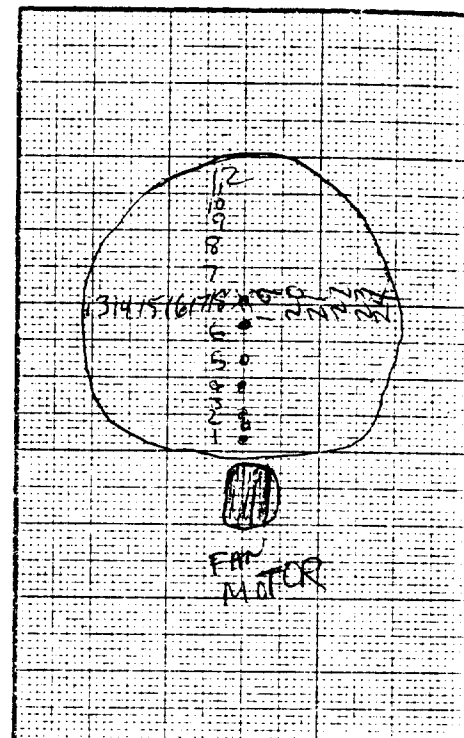
ANALYTICAL METHOD _____

AMBIENT TEMPERATURE _____

GAS	1		2		3		AVERAGE NET VOLUME
	ACTUAL READING	NET	ACTUAL READING	NET	ACTUAL READING	NET	
CO ₂							
O ₂ NET IS ACTUAL O ₂ READING MINUS ACTUAL CO ₂ READING							
CO NET IS ACTUAL CO READING MINUS ACTUAL O ₂ READING							
N ₂ NET IS 100 MINUS ACTUAL CO READING							

TRAVERSE POINT LOCATION & VELOCITY DATA BY _____

TRAVERSE POINT NUMBER	A=FRACTION OF I.D.	B=AXI.D. ID= <u>14 ft</u>	C=B+NIPPLE NIPPLE=	VELOCITY HEAD (h_{p2}), in H ₂ O	STACK TEMPERATURE (T_g), °F
1	2.1	3.5"			
2	6.7	11.25"			
3	11.8	1' 8"			
4	17.7	2' 6"			
5	25.0	3' 6"			
6	35.6	4.5'			
7	64.4				
8	75.0				
9	82.3				
10	88.2				
11	93.3				
12	97.9				
13					
14					
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41					
42					
43					
44					
45					
46					
47					
48					
AVERAGE					

DIAGRAM OF STACK, PORTS, & TRAVERSE
POINTS (indicate direction of flow)

INSIDE DIMENSIONS OF SAMPLE PLANE

13 ftSTACK GAUGE PRESSURE in. H₂O _____NEAREST UPSTREAM DISTURBANCE 0NEAREST DOWNSTREAM DISTURBANCE 3 ftPROCESS & CONTROL EQUIPMENT
DESCRIPTION _____

SCOTT ENVIRONMENTAL TECHNOLOGY, INC.

VO LB

METHOD 110 DATA SHEET

DATE: 7/8/80

AMBIENT TEMPERATURE: $\sim 80^{\circ}\text{F}$

BAROMETRIC PRESSURE: 29.53

TEDLAR BAG NUMBER: 1

Can #

[illegible]

METHOD 110 DATA SHEET

DATE: 7/8/80
 AMBIENT TEMPERATURE: _____
 BAROMETRIC PRESSURE: 29.53
 TEDLAR BAG NUMBER: 3
 Can # 3

[illegible]

S A M P L E D A T A

Plant Bethlehem St. Bethlehem Process Tar decanter-^{#5}battery Date 7/8/80

Sample No. TD 1 Time Sampled 15:25

Sample Type: (Liquid) Air

Liquid ~ 2ft below top
of decanter

Sample Temperature 80 °C

Ambient Temperature _____

Description of Sampling Location: Dipped from hatchway on top
of tar decanter at outlet end

Sample No. TD 2 Time Sampled 16:00

Sample Type: (Liquid) Air

Skimmed from surface

Sample Temperature 82 °C

Ambient Temperature _____

flushing liquor

Description of Sampling Location: dipped from hatchway at
outlet end of decanter

Sample No. _____ Time Sampled _____

Sample Type: Liquid Air

Sample Temperature _____

Ambient Temperature _____

Description of Sampling Location: _____



Scott Environmental Technology Inc.

METHOD 110 DATA SHEET

DATE: 7/9/80

AMBIENT TEMPERATURE: $\sim 90^{\circ}F$

BAROMETRIC PRESSURE: 29.71

TEDLAR BAG NUMBER: 1

Can #

1.044 ft^3 sample volume

[illegible]

METHOD 110 DATA SHEET

can # 4

1210

PROJECT 1906 BENZENE/BaP PRESURVEY

S A M P L E D A T A

Plant Beth Steel, Bethlehem Process Tar decanter, #5 battery Date 7/9/86

Sample No. TD 5 Time Sampled 15:45

Sample Type: (Liquid) Air

*Flashing liquor outlet
from primary coolers*

Sample Temperature 140 °C

Ambient Temperature ~95 °F

Description of Sampling Location:

Sample No. TD 6 Time Sampled 15:45

Sample Type: (Liquid) Air

same

Sample Temperature 140 °C

Ambient Temperature ~95 °F

Description of Sampling Location:

Sample No. _____ Time Sampled _____

Sample Type: Liquid Air

Sample Temperature _____

Ambient Temperature _____

Description of Sampling Location:



Scott Environmental Technology Inc.

METHOD 110 DATA SHEET

can # 3

1.45 $F+^3$ sample vol.

METHOD 110 DATA SHEET

DATE: 7/11/80
 AMBIENT TEMPERATURE:
 BAROMETRIC PRESSURE: 29.51
 TEDLAR BAG NUMBER: 12
 Can # 1

[illegible]

1.22 L^{+3}
Sample vol.

METHOD 110 DATA SHEET

can # 4

Sample vol 1.91 ft³

METHOD 110 DATA SHEET

Can # 4

Sample vol: 1.298 ft³

METHOD 110 DATA SHEET

DATE: 7/2/80

PROCESS: Naphthalene drying tank

AMBIENT TEMPERATURE: *hot*

PROCESS NOTES:

BAROMETRIC PRESSURE:

TEDLAR BAG NUMBER: 3 can 3

[illegible]

Bruce. 694-5921

METHOD AND DATA SHEET

DATE: 7/22/58
 AMBIENT TEMPERATURE: 70°F
 BAROMETRIC PRESSURE:
 TEDLAR BAG NUMBER: 1

CA. H 4

stack

Document 1000

4:10

3.281 ft/meter

METHOD 110 DATA SHEET

DATE: 7-1-68

AMBIENT TEMPERATURE:

BAROMETRIC PRESSURE:

WDLAR BAG NUMBER:

Test 3 Bag 7

[illegible]

SCOTT ENVIRONMENTAL TECHNOLOGY, INC.

PROJECT 1922

METHOD 110 DATA SHEET

PLANT: _____

DATE: _____

PROCESS: _____

AMBIENT TEMPERATURE: _____

PROCESS NOTES: _____

BAROMETRIC PRESSURE: _____

TEDLAR BAG NUMBER: _____

TIME	STACK TEMP	GAS VELOCITY	PUMP FLOWRATE
12:15 ^{am} 0	89°C	250.149	no detectable flow
		249.40	
		$0.749 \text{ m}/30 \text{ sec} = 1.498 \text{ m}/\text{min} = 491 \text{ fpm}$	
10	89°C	250.900	
30	89°C	250.000	
		$0.90 \text{ m}/30 \text{ sec} = 1.8 \text{ m}/\text{min} = 590.6 \text{ fpm}$	
RUN 6			
2:20 ^{am} 0	89°C	251.890	
		251.000	
		$0.890/30 \text{ sec} = 1.78 \text{ m}/\text{min} = 584 \text{ fpm}$	
5	88°C		no detectable flow
~15	test stopped briefly due to blockage in 1st impinger		
20	87°C		
3:00 ^{am} 30	87°C	252.900	
		252.000	
		$0.900/30 \text{ sec} = 1.80 \text{ m}/\text{min} = 591 \text{ fpm}$	
	ambient temp		

SCOTT ENVIRONMENTAL TECHNOLOGY, INC.

RUN 7

PROJECT 1922

METHOD 110 DATA SHEET

PLANT: Bethlehem Steel, BethlehemDATE: 7/24/80PROCESS: Naphthalene drying tank

AMBIENT TEMPERATURE: _____

PROCESS NOTES: steam on at ~1:30

BAROMETRIC PRESSURE: _____

TEDLAR BAG NUMBER: _____

VOID

TIME	STACK TEMP	GAS VELOCITY	PUMP FLOWRATE
1:50 0	98°C	660 fpm	
		$254.432 - 253.000 = 1.432 \text{ m}/30 \text{ sec} = 2.864 \text{ m/min}$	
5		$\textcircled{940}$	$255.148 - 254.400 = 0.748 \text{ m}/30 \text{ sec} = 1.496 \text{ m/min}$
10	99°C		$256.218 - 255.300 = 0.918 \text{ m}/30 \text{ sec} = 1.836 \text{ m/min}$
20	99°C		$256.850 - 256.100 = 0.750 \text{ m}/30 \text{ sec} = 1.50 \text{ m/min}$
25	99°C	leak somewhere	
RUN 7 Bag #8			
2:55 0	99°C	$258.348 - 257.100$	
		$1.248 \text{ m}/30 \text{ sec} = 2.496 \text{ m/min}$	
7		$\textcircled{819} \text{ fpm}$	$258.716 - 258.400 = 0.316 \text{ m}/30 \text{ sec} = 0.632 \text{ m/min}$
			$\textcircled{104} \text{ fpm}$
		line clogged	
		test stopped after ~15 min	
		30 sec	
		$259.830 - 258.700 = 1.13 \text{ m}/30 \text{ min} = 2.26 \text{ m/min}$	
		$\textcircled{942} \text{ fpm}$	

RUN 8

METHOD 110 DATA SHEET

DATE: 11-2-1100

AMBIENT TEMPERATURE: 70

BAROMETRIC PRESSURE: _____

TEDLAR BAG NUMBER: 3

[illegible]

Bethlehem Steel, Bethlehem

Naphthalene drying tank

Run 1 $168 + 108 \text{ ml} = \underline{276 \text{ ml}} \text{ collected}$
 Bag 1 volume = 0.474 ft³

RUN 2

$230 + 173 + 70 = \underline{273 \text{ ml}} \text{ collected}$
 Bag 3 vol = 0.160 ft³

Run 3

$215 + 128 \text{ ml} = \underline{143 \text{ ml}} \text{ collected}$
 Bag 7 vol = 1.027

RUN 4

$182 + 100 \text{ ml} = \underline{\cancel{802} 82 \text{ ml}} \text{ collected}$
 Bag 12 vol = 1.590

$130 + 100 \text{ ml} = \underline{60 \text{ ml}} \text{ collected}$

Bag 11 vol = 1.295

$144 + 100 \text{ ml} = \underline{\quad \quad \quad}$

Bag 1 vol = .970

PROJECT 1922

TRACER GAS DATA SHEET

PLANT: Bethlehem Steel - Bethlehem PA

PROCESS: Denver Flotation Tank

PROCESS NOTES:

Three units working. Unit nearest
Cooling tower is down (#4)

DATE: July 8, 1980

WIND SPEED: Light & variable

WIND DIRECTION: _____

AMBIENT TEMPERATURE: 75°F

BAROMETRIC PRESSURE: 29.55

Weather: mostly cloudy

Sampler Number

Distance from Source

Sampling Rate

Pump Numbers

Tedlar bag numbers

Start Time

Stop Time

DOWNWIND				UPWIND			
1		2		3		4	
10 ft		12 ft		12 ft		10 ft	
10 lph		10 lph		10 lph		10 lph	
6		3		3		8	
13		04		3		9	
11:24		11:24		11:24		11:25	
11:54		11:54		11:54		11:55	

ISOBUTANE RELEASE: Gas Temperature

TIME	METERED VOLUME
11:24 0	73.530
3	73.973
4	74.123
6	74.412
8	74.704
10	74.998
12	75.285
14	75.577
16	75.870
18	76.156
20	76.449
22	76.740
24	77.027
26	77.321
28	77.607
11:54 30	77.890

Gas Pressure

TIME	METERED VOLUME

$$4.360 \text{ ft}^3/30 \text{ min} = 0.1453 \text{ cfm}$$

$$\times 1.059 = 0.1539 \text{ cfm}$$

PROJECT 1922

TRACER GAS DATA SHEET

PLANT: Bethlehem Steel, Bethlehem

PROCESS: Denver Float Unit

PROCESS NOTES:

DATE: 7/8/80

WIND SPEED: _____

WIND DIRECTION: _____

AMBIENT TEMPERATURE: ~ 80°F

BAROMETRIC PRESSURE: 29.55

partly cloudy

Sampler Number
Distance from Source
Sampling Rate
Pump Numbers
Tedlar bag numbers
Start Time
Stop Time

DOWNWIND				UPWIND			
1		2		3		4	
10 ft		12 ft		12 ft		10 ft	
10 lph		10 lph		10 lph		10 lph	
6		3		3		8	
14		23		34		22	
12:09		12:09		12:09		12:10	
12:39		12:39		12:39		12:40	

ISOBUTANE RELEASE: Gas Temperature

TIME	METERED VOLUME
0	80.025
2	80.311
4	80.592
6	80.880
8	81.158
10	81.447
12	81.725
14	82.012
16	82.294
18	82.575
20	82.856
22	83.138
25	83.557
26	83.700
28	83.972
30	84.258

Gas Pressure

TIME	METERED VOLUME

$$4.233 \text{ ft}^3/30 \text{ min} = 0.1411 \text{ cfm}$$

$$\times 1.059 = 0.1494 \text{ cfm}$$

TEST 2
RUN 1

PROJECT 1922

TRACER GAS DATA SHEET

PLANT: Bethlehem Steel, Bethlehem

DATE: 7/15/80

PROCESS: Denver Float Unit

WIND SPEED: _____

PROCESS NOTES:

WIND DIRECTION: _____

Units 1, 3, 4 operating
Tracer line on unit 1

AMBIENT TEMPERATURE: ~80°F

BAROMETRIC PRESSURE: 29.75

Sampler Number

Distance from Source

Sampling Rate

Pump Numbers

Tedlar bag numbers

Start Time

Stop Time

DOWNWIND						UPWIND	
1	2	3				4	
~10 ft →							
10 lph →							
3	3	3					
6	7	8				9	
10:30	10:30	10:30				10:30	

ISOBUTANE RELEASE: Gas Temperature

TIME	METERED VOLUME
10:30 0	107.850 ft ³
2	108.125
4	
6	108.654
8	108.920
10	109.180 .133
12	109.445
14	109.710
16	109.978
18	110.248
20	110.514 .133
22	
24	111.041
26	
28	111.569
30	111.830 .133

Gas Pressure

TIME	METERED VOLUME

$$Y = 1.059 @ .5 \text{ l/min}$$

176
3 x 3

$$3.98 \text{ ft}^3/30 \text{ min} = 0.1326 \text{ overall}$$

$$\times 1.059 = 0.1405 \text{ ft}^3/\text{min}$$

TRACER GAS DATA SHEET

Tracer line on unit 2

$$\times 1.059 = 0.1387 \text{ ft}^3/\text{min}$$

TEST 3

RUN 1

PROJECT 1922

TRACER GAS DATA SHEET

PLANT: Bethlehem Steel, Bethlehem
PROCESS: Denver Float Units
PROCESS NOTES: tracer on unit 2
units 1, 3, 4 operating

DATE: 7/15/80
WIND SPEED: _____
WIND DIRECTION: roughly South
AMBIENT TEMPERATURE: ~ 85 °F
BAROMETRIC PRESSURE: _____

Sampler Number
Distance from Source
Sampling Rate
Pump Numbers
Tedlar bag numbers
Start Time
Stop Time

DOWNWIND				UPWIND	
1	2	3		4	
~ 10 ft →					
10 lph →					
6	3	3			
14	15	16		17	
1.30					

ISOBUTANE RELEASE: Gas Temperature

TIME	METERED VOLUME
13:00	0
2	119.060
4	119.326
6	119.583
8	119.844
10	120.121
12	120.392
14	120.667
16	120.940
18	121.205
20	121.468
22	121.735
24	121.997
26	122.262
28	122.532
30	122.805
	123.071

Gas Pressure

TIME	METERED VOLUME

$$4.011 \text{ ft}^3/30 \text{ min} = 0.1337 \text{ ft}^3/\text{min}$$

$$\times 1.059 = 0.1416 \text{ ft}^3/\text{min}$$

TEST 3

RUN 2

PROJECT 1922

TRACER GAS DATA SHEET

PLANT: Bethlehem Steel, Bethlehem

PROCESS: Denver Float Unit

PROCESS NOTES: Tracer on Unit 1

Units 1, 3, 4 operating

DATE: 7/15/80

WIND SPEED:

WIND DIRECTION: mostly south

AMBIENT TEMPERATURE: $\sim 85^{\circ}\text{F}$

BAROMETRIC PRESSURE:

Sampler Number

Distance from Source

Sampling Rate

Pump Numbers

Tedlar bag numbers

Start Time

Stop Time

DOWNWIND				UPWIND			
1	2	3	4				
~ 10 ft →							
10 lph →							
18	19	20	21				
14:00							
14:30							

ISOBUTANE RELEASE: Gas Temperature

TIME		METERED VOLUME
14:00	0	126.700
	2	126.948
	4	127.218
	6	127.492
	8	127.762
	10	128.030
	12	
	14	128.565
	16	128.834
	18	129.100
	20	129.368
	22	129.640
	24	129.912
	26	130.188
	28	130.460
	30	130.742

Gas Pressure

[illegible]

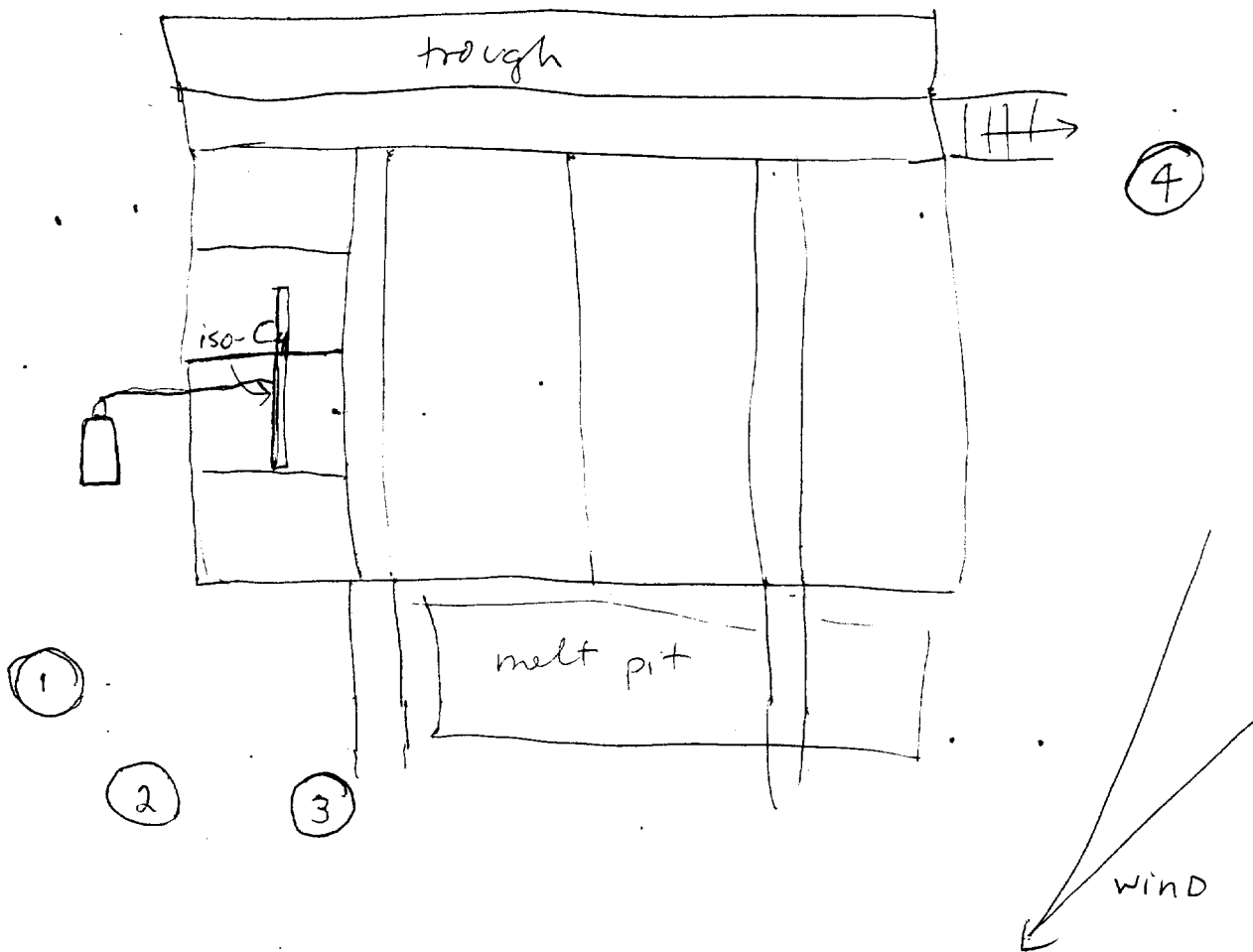
$$4.042 \text{ ft}^3 / 30 \text{ min} = 0.1347 \text{ ft}^3 / \text{min}$$

$$\times 1.059 = 0.1427 \text{ ft}^3/\text{min}$$

Plant Bethlehem Steel, Bethlehem Process Denver Float Unit Date July 8, 1980

Sketch of Process:

Include dimensions and flow directions.



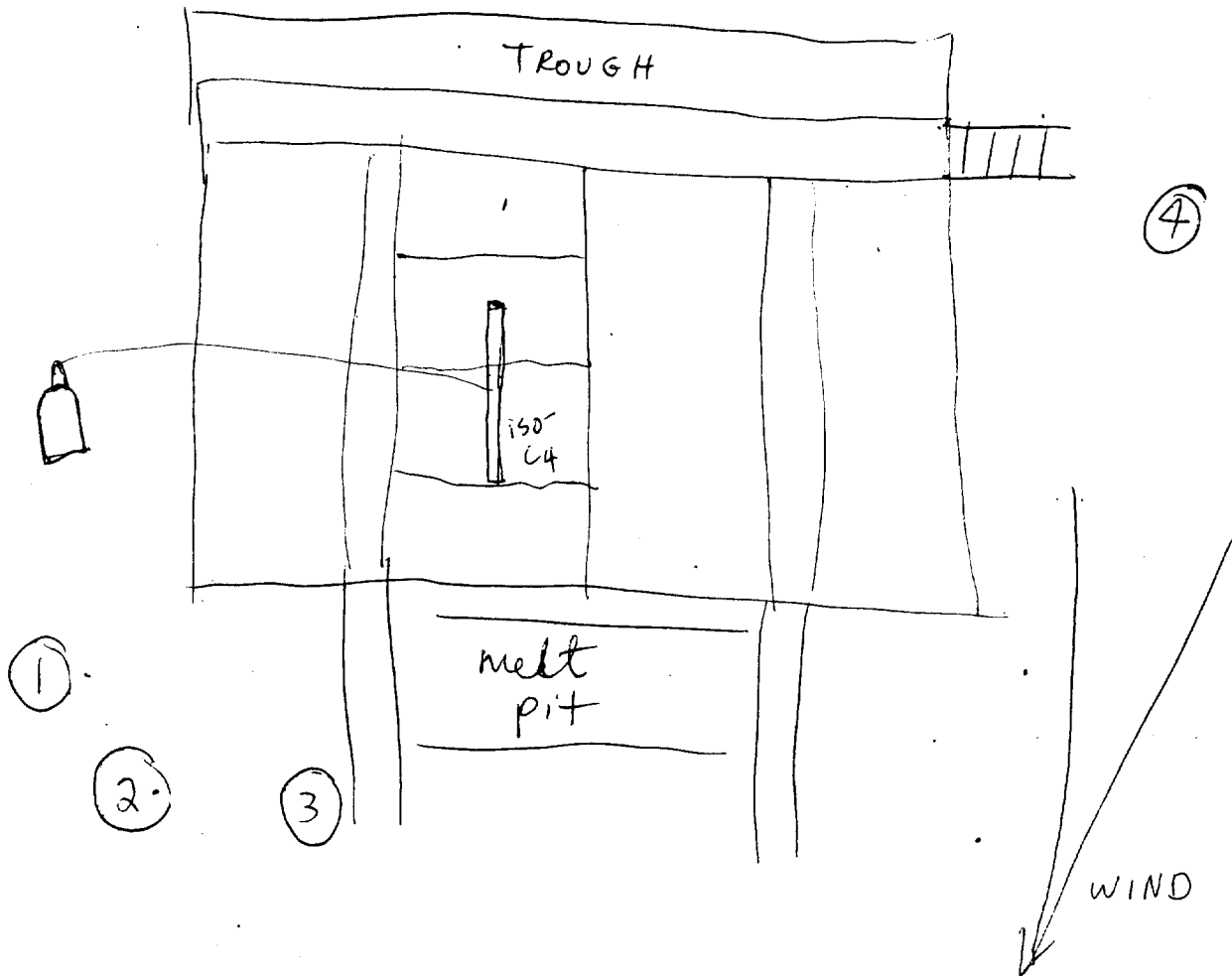
Process Description:



Plant Bethlehem St. Bethlehem Process Denver Float Unit Date 7/8/80

Sketch of Process:

Include dimensions and flow directions.



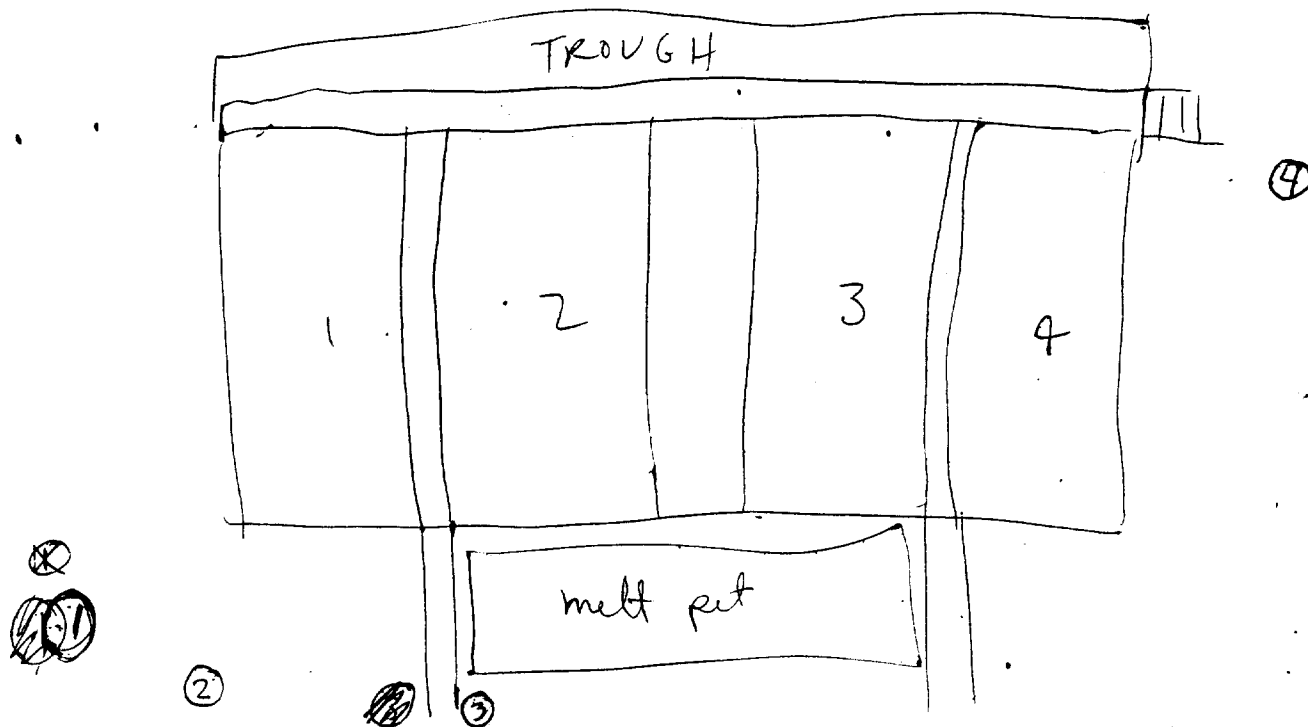
Process Description:



Plant Beth Steel - Bethlehem Process Denver Float Unit Date 7/15/80

Sketch of Process:

Include dimensions and flow directions.



Process Description:

Units 1, 3, and 4 working



PROJECT 1906 BENZENE/BaP PRESURVEY

SAMPLE DATA

Plant Beth Steel Beth. Process Denver Unit Date 7/15/86

Sample No. Trough next to Denver Unit Time Sampled 10:50

Sample Type: Liquid Air

During tracer test
#1

Sample Temperature 38°C

Ambient Temperature 30°C

Description of Sampling Location: open
Trough in ground next to Denver
Unit

Sample No. Denver Unit Section #1 Time Sampled 10:52

Sample Type: Liquid Air

Sample Temperature 36°C

Ambient Temperature 30°C

Description of Sampling Location:

Sample No. Denver Unit Section #2 Time Sampled 10:53

Sample Type: Liquid Air

Sample Temperature 35°C

Ambient Temperature ~30°C

Description of Sampling Location:

Sec. 2 not operating
at time of
sample



Scott Environmental Technology Inc.

PROJECT 1922

TRACER GAS DATA SHEET

PLANT: Bethlehem Steel, Bethlehem

PROCESS: Naphthalene melt

PROCESS NOTES:

melt started 7:50 am (steam started)

DATE: 7/15/80

WIND SPEED: SSW

WIND DIRECTION: _____

AMBIENT TEMPERATURE: _____

BAROMETRIC PRESSURE: _____

Sampler Number

Distance from Source

Sampling Rate

Pump Numbers

Tedlar bag numbers

Start Time

Stop Time

DOWNWIND			UPWIND		
1	2	3	4		
10 ft	10 ft	10 ft	10 ft		
10 lph	10 lph	10 lph	10 lph		
4	3	3	8		
5	2	3	4		
8:00	8:00	8:00			

ISOBUTANE RELEASE: Gas Temperature

TIME	METERED VOLUME
8:00	0
2	89.900
4	90.095
6	90.362
8	90.629
10	90.890
12	91.154 .125
14	91.418
16	91.935
18	92.190
20	92.445 .129
22	92.698
24	92.949
26	93.200
28	93.463
30	93.746 .129

Gas Pressure

TIME	METERED VOLUME
	cake begins to melt
	cake ~ 1/3 melted
	really starting to steam
	cake still 1/2 melted
	looks fully melted
	changed drum 1 over to pump 4
	drum 1 weak
	too much steam to see pit

$$3.84 \text{ ft}^3 / 30 \text{ min} = .128 \text{ ft}^3 / \text{min}$$

overall

PROJECT 1922

TRACER GAS DATA SHEET

PLANT: Bethlehem Steel, Bethlehem

PROCESS: Naphthalene melt

PROCESS NOTES:
melt on 8:00
Salt in 8:30

DATE: 7/15/80

WIND SPEED: _____

WIND DIRECTION: _____

AMBIENT TEMPERATURE: _____

BAROMETRIC PRESSURE: _____

Sampler Number

Distance from Source

Sampling Rate

Pump Numbers

Tedlar bag numbers

Start Time

Stop Time

DOWNWIND			UPWIND
1	2	3	4
6 ft	6 ft	6 ft	6 ft
10 lph	10 lph	10 lph	10 lph
4	3	31	
13	34	64	3

ISOBUTANE RELEASE: Gas Temperature

TIME	METERED VOLUME
8:37 0	95.000 ft ³
2	95.265
4	95.528
6	95.790
8	96.050 .131
10	96.308
12	96.560
14	96.811
16	97.062
18	97.315 .126
20	97.569
22	97.827
24	98.095
26	98.365
28	98.630 .131
30	98.890

Gas Pressure

TIME	METERED VOLUME
	too much steam to see melt pit
	plume straight up
	plume on ground
	plume on ground
	can #3 switched to pump #1
	can #3 not doing too well - hour 10

3.890 ft³/30 min

0.129 ft³/min overall

TEST 2

RUNS 1 & 2

PROJECT 1922

TRACER GAS DATA SHEET

PLANT: Bethlehem Steel - Bethlehem

DATE: 7/16/80

PROCESS: Hot Water Mill - air

WIND SPEED:

PROCESS NOTES:

WIND DIRECTION: S-SW

Unit started ~ 7:00

AMBIENT TEMPERATURE: ~ 75°F

Unit dumped ~ 8:04

BAROMETRIC PRESSURE: 29.57

NOTE: Barrels 1 and 2 are more in the plume than = 3

Sampler Number

Distance from Source

Sampling Rate

Pump Numbers

Tedlar bag numbers

Start Time

Stop Time

DOWNWIND				UPWIND			
1	2	3	4	5	6	7	8
~ 10 ft	~ 10 ft	~ 10 ft	~ 10 ft	~ 10 ft	~ 10 ft	~ 10 ft	~ 10 ft
1/10 cph	1/10 cph	1/10 cph	1/10 cph	1/10 cph	1/10 cph	1/10 cph	1/10 cph
6	3	5	8	9	13	22	17
23	21	4	10	7.30	8:09	7.30	8:09
7.30	8:09	7.30	8:09	7.30	8:09	7.30	8:09

meter dropped between Runs 1 & 2
Meter 1 = 1.059

ISOBUTANE RELEASE: Gas Temperature

TIME	METERED VOLUME	Gas Temperature
7.30	0	131.83
2		132.113
4		132.397
6		132.659
8		132.934
10	.157	133.201
12		133.467
14		133.735
16		
18		134.263
20	.132	134.521
22		134.789
24		135.060
26		135.327
28		135.591
30	.133	135.855

Gas Pressure

TIME	METERED VOLUME	Gas Pressure
8:09	0	137.050
2		137.329
4		137.608
6		137.885
8		138.157
10	.138	138.435
12		138.705
14		138.975
16		139.249
18		139.518
20	.135	139.788
22		140.065
24		140.336
26		140.610
28		140.880
30		141.145

$$4.625 \text{ ft}^3/30 \text{ min} = 0.1542 \text{ ft}^3/\text{min}$$

$$\times 1.059 = 0.1622 \text{ ft}^3/\text{min}$$

$$4.645 \text{ ft}^3/30 \text{ min} = 0.1548 \text{ ft}^3/\text{min}$$

$$\times 1.059 = 0.1635 \text{ ft}^3/\text{min}$$

TEST 3

RUNS 1 & 2

PROJECT 1922

TRACER GAS DATA SHEET

PLANT: Bethlehem Steel, Bethlehem

PROCESS: Naphthalene melt pit

PROCESS NOTES:

Denver units 2, 3, 4 operating

NOTE: raining, wind not steady

DATE: 7/17/80

WIND SPEED: variable

WIND DIRECTION: variable

AMBIENT TEMPERATURE: ~75 °F

BAROMETRIC PRESSURE: 29.51

Sampler Number

Distance from Source

Sampling Rate

Pump Numbers

Tedlar bag numbers

Start Time

Stop Time

DOWNWIND						UPWIND	
1		2		3		4	
~8 ft		8 ft		8 ft		10 ft	
10 lph		10 lph		10 lph		10 lph	
6	6	3	3	3	3	8	8
2	8	3	10	5	34	6	18

WIND WRONG

Meter 4 = 1.059

ISOBUTANE RELEASE: Gas Temperature

TIME	METERED VOLUME	ft ³
7:15	0	155.30
2		155.567
4		155.828
6		156.09
8		156.352
10		156.875
12		157.139
14		157.407
16		157.680
18		157.948
20		158.210
22		158.470
24		
26		
28		158.998
30		159.258

Gas Pressure

TIME	ft ³	METERED VOLUME
8:18	0	160.05 wind good
2		160.320 "
4		160.578 "
6		160.842 "
8		161.106 "
10		161.372 "
12		161.634 "
14		161.890 bad
16		162.149 OK
18		162.41 bad
20		162.675 "
22		162.938 "
24		163.200 good
26		163.459 bad
28		163.727 OK
30		163.950 good

$$3.958 \text{ ft}^3/30\text{min} = .1319$$

$$\times 1.059 = 0.1397 \text{ ft}^3/\text{min}$$

$$3.90 \text{ ft}^3/30\text{min} = 0.130$$

$$\times 1.059 = 0.1376 \text{ ft}^3/\text{min}$$

PROJECT 1922

TRACER GAS DATA SHEET

PLANT: Bethlehem Steel

PROCESS: Naphthalene melt

PROCESS NOTES:

melt started ~ 7:25

Denver units 1, 2, 3 up

Salt dumped ~ 8:30

DATE: 7/18/80

WIND SPEED: 11 ft & steady

WIND DIRECTION: N

AMBIENT TEMPERATURE: _____

BAROMETRIC PRESSURE: _____

Sampler Number

Distance from Source

Sampling Rate

Pump Numbers

Tedlar bag numbers

Start Time

Stop Time

DOWNWIND						UPWIND	
1		2		3		4	
2 ft		2 ft		2 ft		25 ft	
10 lph		10 lph		10 lph		10 lph	
9 14		16 19		17 34		23 22	
7:36 8:30		7:36 8:30		7:36 8:30		7:36 8:30	

ISOBUTANE RELEASE: Gas Temperature

TIME		METERED VOLUME
7:36	0	175.800
	2	
	4	176.332
	6	176.607
	8	176.876
	10	177.141
	12	177.403
	14	177.668
	16	177.950
	18	178.231
	20	178.513
	22	wind shifts S
	24	179.062
	26	179.329
	28	179.592
	30	179.855

Gas Pressure

TIME		METERED VOLUME
8:30	0	182.100
	2	182.373
wind	4	182.639
good	6	182.904
whole	8	183.175
time	10	183.447
	12	183.702
	14	183.988
	16	184.264
	18	184.540
	20	184.817
	22	185.084
	24	185.356
	26	185.627
	28	185.890
	30	186.153

Samplers are between melt pit & Denver units

$$4.055 \text{ ft}^3/30\text{min} = 0.135 \text{ ft}^3/\text{min}$$

$$\times 1.059 = 0.143 \text{ ft}^3/\text{min}$$

$$4.053 \text{ ft}^3/30\text{min} = 0.135 \text{ ft}^3/\text{min}$$

$$\times 1.059 = 0.143 \text{ ft}^3/\text{min}$$

TEST 1
RUNS 1 & 2

PROJECT 1922

TRACER GAS DATA SHEET

PLANT: Bethlehem Steel, Bethlehem

PROCESS: Background for melt pit

PROCESS NOTES:

tracer manifold on melt pit
Denver units 1, 2, 3 operating
melt pit just starting to fill

DATE: 7/17/80

WIND SPEED: light

WIND DIRECTION: steady SSW - occasionally swirling

AMBIENT TEMPERATURE: _____

BAROMETRIC PRESSURE: _____

Sampler Number

Distance from Source

Sampling Rate

Pump Numbers

Tedlar bag numbers

Start Time

Stop Time

DOWNWIND						UPWIND	
1	2	3	4	5	6	7	8
8 ft	8 ft	8 ft	10 ft				
6	3	3	8				
12	4	13	15	14	21	23	22
11:22	11:19	11:19	11:20				

Barrels are ~6 ft from melt and ~15 ft from Denver unit

ISOBUTANE RELEASE: Gas Temperature

TIME	METERED VOLUME
11:19	0
2	166.300
4	
6	167.092
8	167.352
10	167.623
12	167.887
14	
16	168.411
18	168.670
20	168.937
22	169.075
24	169.494
26	169.763
28	170.030
30	170.300

Gas Pressure

TIME	METERED VOLUME
13:07	0
2	170.700
4	170.971
6	171.514
8	171.777
10	172.050
12	172.317
14	172.575
16	172.829
18	173.103
20	
22	173.638
24	173.898
26	174.177
28	174.447
30	174.709

Steam on to clean lines for ~4 min

$$4.000 \text{ ft}^3 / 30 \text{ min} = 0.133$$

$$\times 1.059 = 0.1412 \text{ ft}^3 / \text{min}$$

$$4.009 \text{ ft}^3 / 30 \text{ min} = 0.1336$$

$$\times 1.059 = 0.1415 \text{ ft}^3 / \text{min}$$

TEST 1
RUNS 1 & 2
VOID

PROJECT 1922

TRACER GAS DATA SHEET

PLANT: Bethlehem Steel, Bethlehem

DATE: 7/16/80

PROCESS: Denver unit (naphth. melt)

WIND SPEED: _____

PROCESS NOTES:

WIND DIRECTION: S-SW

Background for melt pit data
Drums & trace manifold in
positions same as for melt

AMBIENT TEMPERATURE: ~80 °F

BAROMETRIC PRESSURE: 29.57

Units 2, 3, 4 operating

Sampler Number

Distance from Source

Sampling Rate

Pump Numbers

Tedlar bag numbers

Start Time

Stop Time

DOWNWIND				UPWIND			
1		2		3		4	
~ 8 ft		8 ft		8 ft		10 ft	
10 2ph. — 7							
6						8	
12-	7	14	11	15	10	16	20
10:28	11:08	10:28	11:08	10:28	11:08	10:29	11:08

Melt pit is empty at 0

Meter 4 = 1.059

ISOBUTANE RELEASE: Gas Temperature

TIME	METERED VOLUME	4-3
10:28 0	141.850	
2		
4	142.370	
6	142.657	
8	142.947	
10 .137	143.219	
12	143.495	
14	143.762	
16	144.028	
18	144.292	
20 .134	144.557	
22	144.840	
24	145.134	
26	145.425	
28	145.719	
30	146.014	

Gas Pressure melt pit empty at 200

TIME	METERED VOLUME
10:28 0	147.450
2	147.735
4	148.021
6	148.310
8	148.698
10	
12	149.167
14	149.447
16	149.714
18	149.992
20	150.270
22	
24	150.875
26	
28	151.490
30	151.763

Rotameter is leaking isobutane
melt pit is filling at end

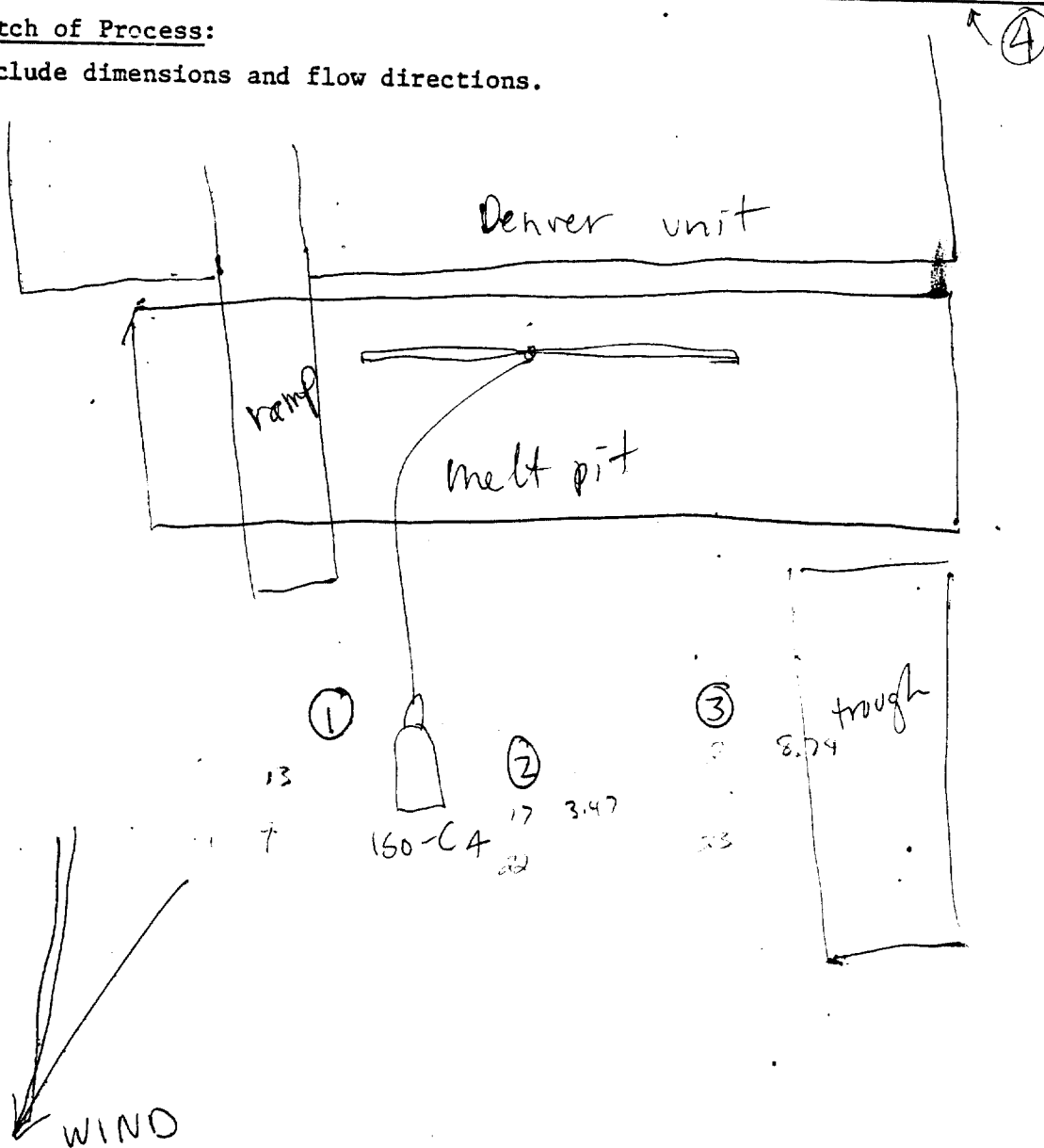
Plant Bethlehem

Process melt pit

Date _____

Sketch of Process:

Include dimensions and flow directions.



Process Description:



APPENDIX C
LABORATORY DATA SHEETS



CHROMA: C ANALYSIS LOG

010-104X
003-104X

Butch Lewis, S. L. L. L. L.

Project No. 1000

Date 7/1/92

Analyst

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	Tissue #2 Dance #2 at 400	4-55 @ 108x 4-55 @ 108x	.246 .048	8.61 ppm 1.72 ppm	1/24
	(2) Dug # 04	4-48 @ 108x	.123	3.51 ppm	2738
	(1) Dug # 13	4-48 @ 108x	.048	.504 ppm	112
	(3) Dug # 3	4-57 @ 108x	.246	14.51 ppm	1132
	(4) Dug # 3	4-48 @ 108x	.018	2.02 ppm	1112
	(5) Dug # 3	4-48 @ 108x	.015	0.12 ppm	
	(1) Dug # 14	4-41 @ 108x	.062	3.03 ppm	8.7
	(2) Dug # 13	4-41 @ 108x	.012	0.15 ppm	5998
	(3) Dug # 34	4-41 @ 108x	.123	7.69 ppm	28.2
	(4) Dug # 34	4-41 @ 108x	.024	0.40 ppm	1293.6
	(5) Dug # 34	4-41 @ 108x	.246	1.61 ppm	65.4
	(6) Dug # 34	4-41 @ 108x	.048	1.13 ppm	
	(7) Dug # 34	4-17 @ 108x	.015	0.72 ppm	



010-104X
003-104X

CHROMATOGRAPHIC ANALYSIS LOG

Butyltin Sulfide

Project No. 1977 Date 7/2/77 Analyst [Signature]

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	Butyltin Sulfide Std 6.11 ϕ 6.04/5.10 ⁴	6.6	.0015 %		
	of Sulfide 12.25 (ppm) 12.25/8.35	8.35	1.47 % (0.0017 %)		
	Butyltin Sulfide #1 (6.04/5.10)	8.45	.0017 %	1.76 ppm	2.00/1.40 ppm
	Butyltin Sulfide #2 (6.04/5.10)	9.13	1.47 %	1.34/1.76 ppm	2.00/1.40 ppm



CHROMATOGRAPHIC ANALYSIS LOG

Project No. 17224 Date 10/28/00 Analyst CB

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	4730 no identification Sample "A" No. 66.6 C 128 x 10 ⁴	77.5	18.6755	1447.2 ppm	
	4730 no identification Sample "A" No. 66.6 C 128 x 10 ⁴	37.5	18.6755		
	4730 no identification Sample "A" No. 66.6 C 128 x 10 ⁴	37.5	18.67	958.2 ppm	
	4730 no identification Sample "A" No. 66.6 C 128 x 10 ⁴	30.5	18.67	742.8 ppm	



CHROMATOGRAPHIC ANALYSIS LOG

 Project No. 1922 Date 7-9-90 Analyst T.B.

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
0.15 min	Sample 1 (Blanking)	3.00000	1.000	0.15 ppm	
	Sample 2 (Blanking)	6656.52	1.000	4.13 ppm	
	Sample 3 (Blanking)	3356.81	1.015	0.54 ppm	
	Sample 4 (Blanking)	2156.32	1.000	3.80 ppm	
0.10 min	Std 1005 ppm	8056.1024			
	Std 1005 ppm	8056.1024	1.52	134.67 ppm	
	Std 1005 ppm	3756.1024	1.91	7178.1000	
	Std 1005 ppm	6946.1024	1.91	7178.1000	



CHROMATOGRAPHIC ANALYSIS LOG

Project No. 1911

Date 7-11-80

Analyst T.B.

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Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
12:30	100% 5000 T2L (- 5000 and 5000)	77.5	1.98		100% 5000 T2L
12:30	100% 5000 T2L DLE 10% (600000)	62.5 (50)	1.98 3.16	1275 1275 1275	100% 5000 T2L DLE 10% (600000)
12:30	100% 5000 T2L DLE 10% (600000)	10	1.98 1.98	10% 10% 10%	100% 5000 T2L DLE 10% (600000)
12:30	100% 5000 T2L DLE 10% (600000)	63.15 (50)	1.98 1.97	12.50 12.50 12.50	100% 5000 T2L DLE 10% (600000)
12:42	100% 5000 T2L DLE 10% (600000)	2	1.98 1.97	3.14 3.14 3.14	100% 5000 T2L DLE 10% (600000)
12:42	100% 5000 T2L DLE 10% (600000)	2	1.98 1.97	3.14 3.14 3.14	100% 5000 T2L DLE 10% (600000)
12:42	100% 5000 T2L DLE 10% (600000)	35	1.98 1.97	13.10 13.10 13.10	100% 5000 T2L DLE 10% (600000)
12:42	100% 5000 T2L DLE 10% (600000)	1.5	1.98 1.97	0.147 0.147 0.147	100% 5000 T2L DLE 10% (600000)
12:42	100% 5000 T2L DLE 10% (600000)	1.5	1.98 1.97	0.147 0.147 0.147	100% 5000 T2L DLE 10% (600000)



CHROMATOGRAPHIC ANALYSIS LOG

Project No. 10412

Date 10/1/91

Analyst J.P.

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
18.50	875 ppm of Stalox	715	1.65	11625 ppm	
	End of Run - Run #2	700	1.65 206	11625 14270 ppm	
	System Check w/ 1000 ppm	1	1.65 206	11625 4200 ppm	
	1000 ppm #14 End of Run	1	1.65 206	10800 ppm	
	" (Blank) #1	1	1.65 206	10800 ppm	
	1000 ppm #15	1	1.65 206	10800 ppm	
	1000 ppm #16	1	1.65 206	10800 ppm	
18.57	1000 ppm of Stalox	745		14270 ppm	
	End of Run - Run #3	6275	1.65 206	11625 13180 ppm	
	Blank w/ 1000 ppm of Stalox	46	1.65 350	15750 ppm	
	Blank #1	45		14750 ppm	
	Blank #2	515	1.65 350	18075 ppm	



CHROMATOGRAPHIC ANALYSIS LOG

Project No. 1000 Date 7/1/88 Analyst XX

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
29.75	6.11 9.10 & 9.11 C 1041214	29.75	1.007	14.25 ppm	Thin bedded sandstone with thin mudstone interbeds.
29.75	Chert, Tuff, shale containing "spinel" "diamond" etc.	6.9 3.5 3.85	1.007	15.16 ppm	
	D 1041214 #4	73.25 74.75	1.007	1.254 ppm	
	1000 1041214 #15	1.5	1.052	1.304 ppm	
	1000 1041214 #14	3	1.052	1.254 ppm	
	1000 1041214 #13	4.5	1.052	1.254 ppm	
	1000 1041214 #12	5.5	1.052	1.254 ppm	
	1000 1041214 #11	6.5	1.052	1.254 ppm	
	1000 1041214 #10	7.5	1.052	1.254 ppm	
	1000 1041214 #9	8.5	1.052	1.254 ppm	
	1000 1041214 #8	9.5	1.052	1.254 ppm	
	1000 1041214 #7	10.5	1.052	1.254 ppm	
	1000 1041214 #6	11.5	1.052	1.254 ppm	
	1000 1041214 #5	12.5	1.052	1.254 ppm	
	1000 1041214 #4	13.5	1.052	1.254 ppm	
	1000 1041214 #3	14.5	1.052	1.254 ppm	
	1000 1041214 #2	15.5	1.052	1.254 ppm	
	1000 1041214 #1	16.5	1.052	1.254 ppm	



CHROMATOGRAPHIC ANALYSIS LOG

 Project No. 9122 Date 7-11-80 Analyst JH

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
12.00	1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine)	11.6 25.0 25.0	8.26 4.13	90.80 x 1000 90.80	2nd 3rd 4th (5th) peak 1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine)
1.15	1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine)	24.5 24.5 24.5	4.13	92.93 x 1000 92.93	92.930 gpm 91895 gpm
	1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine)	25.15 25.15 25.15	4.13	104.18 x 1000 104.18	104.180 gpm
	1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine)	28 28 28	4.13	115.64 x 1000 115.64	115.640 gpm
	1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine)	28.5 28.5 28.5	4.13	109.75 x 1000 109.75	109.750 gpm
	1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine)	27 27 27	2.07	55.84 x 1000 55.84	55.840 gpm
	1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine) 1000 x 0.1% (Chlorine)	24.5 24.5 24.5	2.07	50.72 x 1000 50.72	50.720 gpm



CHROMATOGRAPHIC ANALYSIS LOG

Project No. 1438

Date 7-11-80

Analyst TB

Bottle # 12

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
5:30	Sample 1 (fide)	5.5	100%	1.14	
	Sample 2 (fide)	5.4	1.47	79.38	
	Sample 3 (fide)	4.8	1.09	4.75 ppm	
	Sample 4 (fide)	4.8	1.39	18.71	
	Sample 5 (fide)	4.5	1.39	17.73	
	Sample 6 (fide)	4.5	1.39	13.57	
	Sample 7 (fide)	4.5	1.39	1.43	
	Sample 8 (fide)	4.5	1.39	1.34	
	Sample 9 (fide)	4.5	1.39	7.88	
	Sample 10 (fide)	4.5	1.39	7.52	
	Sample 11 (fide)	4.5	1.39	7.09	



CHROMATOGRAPHIC ANALYSIS LOG

 Project No. 1922 Date 7-11-80 Analyst 773

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	Hit Old Condensate Run # 4 10/22/80	26.5	413	1094.45	10945.500
	Old #1 10/22/80	27	413	111.51	111510.000
	Old #2 10/22/80	58	211		
	10/22/80 10/22/80 10/22/80 10/22/80				



CHROMATOGRAPHIC ANALYSIS LOG

Project No. K123Date 7-14-80Analyst TB

B. Thibault

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
PM	12.25 ppm of Std 513 x 10 ⁴	70.2 15 11 12 70	1.61 ^{674 (231)}		
	Cell Count Std 64/x 10 ⁴	87.5 85	.002 (.212 ave)		
	Bottom cell G.C. Sample 128 x 10 ⁴ V.E.	8 85 75	.424	3.40 ppm	
	Cell Count # 19				
	J.C. 62 # 17	13.5	.424	5.72 ppm	
	100 L.B. # 7 Bk 128 x 10 ⁴	3	.424	1.27 ppm	
PM	100 L.B. # 8 Bk 128 x 10 ⁴	33	.424	13.49 ppm	
	100 L.B. # 12 Bk 128 x 10 ⁴	40	.424	16.96 ppm	



CHROMATOGRAPHIC ANALYSIS LOG

C. Williams, Jr.

 Project No. 1902 Date 7/1/90 Analyst TR

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
9M	100% Benzene #12 Bk 128104	72	.724	5.512	
	100% Benzene #4 Bk 128104	13	.124	5.512	
	90% Benzene #12 Bk 128104	9	.424	3.812	
	Benzene #11 - Naphthalene 128104	72	.424	30.53	
	Oil or 128104	75	.424	3.18 x 10 31.8	
	Benzene #12 - Naphthalene 128104	56.5	.161	0.577	





CHROMATOGRAPHIC ANALYSIS LOG

Project No. 1922

Date 7-15-80

Analyst RB

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Am Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
29.00	6.11 gms of Soil 322x104	473	.129		
	1.06 gms of Soil 10x104	16.9	.062		
12.34	Butyl Alcohol Methyl Ethyl Ketone Rem'd - Test 1	15.75 73.25	.062 .129	0.977 ppm 9.45 ppm	$\times 58 = 56.64$ $\times 78 = 737.10$ #/cc <u>13.01</u>
	Butyl Alcohol - 16x	46.85	.062	1.32 ppm	$\times 58 = 76.45$ <u>13.75</u>
	Butyl Alcohol - 16x	52.25	.258	13.48 ppm	$\times 78 = 1051.75$
	Butyl Alcohol - 16x	57.75	.062	1.49 ppm	$\times 58 = 85.42$
	Butyl Alcohol - 16x	57.75	.258	14.72 ppm	$\times 78 = 1148.16$
	Butyl Alcohol - 16x	16	—	—	
	Butyl Alcohol - 16x	16	.205	1.03 ppm	<u>13.45</u>

CHROMATOGRAPHIC ANALYSIS LOG

 Project No. 1233 Date 7-5-80 Analyst TS

Run Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
2.0.30	Sample 1				4/24
	Run #4				
	Pro #5 - 10x	16.5	.062	0.213 ppm	x58 = 4135
	Pro #5 - 32x	89	.129	1148 ppm	x78 = 89551
	Std. cell exp 4	46			
	106 ppm 10x	16.5			
	Pro #4 - 10x	ND			
	Pro #4 - 32x	5.5	.129	0.11 ppm	
	Pro #2 - 10x	16.5	.062	17.5 1.102	x58 = 39.53
	Pro #2 - 32x	68	.129	17.54 ppm	x58 = 130843 2306
	Pro #3 - 10x	15	.062	0.93 ppm	x58 = 5394
	Pro #3 - 32x	64.25	.129	16.58 ppm	x78 = 1292.97



10:00 AM

CHROMATOGRAPHIC ANALYSIS LOG

Project No. 1532

Date 5-8-82

Analyst TB

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	Box #10 Dioxin (10) (10x) Test #2 Ring #1 Box #10 Dioxin (4) - 10x 16.5 4.6 1.02 ppm 5.16 ppm 1.02 1.39 1.02 ppm 5.42 ppm 1.16 ppm 18.76 ppm 0.75 ppm	16.5 4.6 17.5 4.2 18.75 73.5 110 115	1.02 1.39 1.02 1.29 1.02 1.58 1.02 1.58	1.02 ppm 5.16 ppm 1.02 ppm 5.42 ppm 1.16 ppm 18.76 ppm 0.75 ppm	4/24 1.58 = 5.916 1.78 = 4.248 1.58 = 6.322 1.78 = 4.226 1.58 = 6.743 1.78 = 14.29.11 high 1.62 by 1.58 then 1.58 by 1.58



CHROMATOGRAPHIC ANALYSIS LOG

Belknap Co

Project No. 422 Date 7-15-80 Analyst TR

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
PM 2:30	Denver District #12 Run #2				4/104
	Box #10 Dec-Cy 8x	6.5	.001	2,102 ppm	MS = 11.72
	4 - 16x	68	.005	442 ppm	MS = 344.16
	Box #11 Dec-Cy 8x	15.75	.031	5488	MS = 28.32
	4 - 32x	44	.129	5488 5,608 ppm	MS = 15.63
	Box #12 Dec-Cy 8x	77.5	.031	240 ppm	MS = 139.35
	4 - 64x	11.5	.058	18,254 ppm	MS = 1438.31
	Std Cellulose 32x	49			
	100-gram 16x	175			
	Box #13 (Control) 200-gram	6.5	.10	665	

CHROMATOGRAPHIC ANALYSIS LOG

Butcher's

Project No. 1122

Date 7-15-80

Analyst TP

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PM Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
4:36	Denver Plant Point Part #3 Run #1 Bag #14 Acety - 8x φ - 32x	7 55.25	.031 .129	0.12 ppm 7.13 ppm	SS = 12.76 78 = 533.93 6/24
	Bag #15 Acety - 8x φ - 32x	10 65	.031 .129	0.196 ppm 8.39 ppm	SS = 28.17 78 = 634.42 41%
	Bag #16 Acety - 8x φ - 64x	64.0 54.25	.031 .258	1.97 ppm 14.0 ppm	SS = 164.26 78 = 1091.73 9.52
	Std 106 ppm acy - 16x 6.11 ppm φ - 32x Bag #17 Acety - 8x 100% Diox	17 49 6	0.1	0.60 ppm	



CHROMATOGRAPHIC ANALYSIS LOG

Reichman Co

Project No. 1000

Date 7-5-80

Analyst TB

Run Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
6.00	Denver 1st Plant Spill Test #3 Run #2 Box #18	43.5 51.5	.031 .129 .129	0.55 ppm 6.64 ppm	X58 = 5484 X78 = 518.19 9.45
7.00	Box #14 Analy - 8X 4 - 32X	43.5 55.5	.031 .129	1.70 ppm 7.16 ppm	X58 = 7182 X78 = 558.44 7.60
7.20	Box #20 Analy - 8X 4 - 64X	40 53	.031 .058	1.24 13.67	X58 = 7182 X78 = 1030.57 9.83
	STD 1000 ppm Collection 4	16.5 48			
	Box #21 Ground 1000 ppm	4.5	.01	0.45 ppm	





CHROMATOGRAPHIC ANALYSIS LOG

Project No. 1122

Date 7-16-88

Analyst W.B.

Butcher R.

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	Std. Cellulose 30x10 ⁴	48	0.127		
	100 ppm acy 10x10 ⁴	18.2	0.058		
	High Purity Bz Purity #2 10x10 ⁴				
	Bz #9 acy 8x	59 43	0.29	1.25 ppm	158 - 72.33
	Bz #8 acy 8x	59	0.254	1499 ppm	158 - 1168.11
	Bz #12 acy 8x	57.5	0.29	1.52 ppm	158 - 88.31
	Bz #6 acy 8x	59.75	0.254	15.18 ppm	158 - 1184.04
	Bz #23 acy 8x	60	0.29	2.754 ppm	158 - 43.73
	Bz #3 acy 8x	40.35	0.254	10.22 ppm	158 - 747.43
	Bz #1 acy 8x	N(1)	—	—	
	Bz #4 acy 8x	41	0.254	1.00 ppm	
	Std. 100 ppm acy	18			
	Cellulose 4	45.5			

CHROMATOGRAPHIC ANALYSIS LOG

Project No. 1902 Date 1-10-80 Analyst Butcher

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
12.45	Std 6.11 gmp. 100 gmp. 100	51 18			
	North by St. St. 1st Run #1				
	Box #10 4 gmp. 4x - 4x 8 - 32x	110 6	.029	0.774 gmp	
	Box #7 104 - 8x 8 - 32x	73.25 42.5	.029 .029	2.12 gmp 5.48 gmp	x58 = 113.21 x78 = 42.169
	Box #21 104 - 8x 8 - 32x	48 68.75	.029 .029	1.39 gmp 8.87 gmp	x58 = 80.141 x78 = 691.06
3.49	Box #13 104 - 8x 8 - 32x	53 44	.029 .029	1.54 gmp 11.35 gmp	x58 = 81.15 x78 = 885.46
	Std 6.11 gmp. 32x 100 gmp. 100	50 175			



CHROMATOGRAPHIC ANALYSIS LOG

Bottleheads

Project No. 1922

Date 7-17-86

Analyst J.R.

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
4:00	Std Calibration BR 124	6.5	0.100		
	Bag # Background	4.5	0.25 100		
	Bag # 16	110	—		
	Bag # 9	2	0.20 100		
	Bag # 21	1	0.10 100		
	Bag # 22	15	0.15 100		
	Bag # 15	4.5	0.25 100		
	Bag # 12	3.0	0.30 100		
	Bag # 14	3.0	0.10	0.25 100	
	Bag # 23	1.0		0.10 100	
8:17	Bag # 13	1.0		0.10 100	



CHROMATOGRAPHIC ANALYSIS LOG

Project No. 1122

Date 7-17-80

Analyst T.B.

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	Std 6.11 ppm 3x10 ⁴ 100 ppm 4-8x10 ⁴	50 53.67	0.122 0.57		Diethylene 0.1347. 163/m
	Bag #1 KC4 - 8x 4 - 32x	525 53.75	0.27 0.122	0.80 ppm 6.50 ppm	55.4646 55.51168
	Bag #3 KC4 - 8x 4 - 32x	48.75 50.35	0.037 0.122	1.41 ppm 6.80 ppm	55.81.78 55.53508
	Bag #5 KC4 - 8x 4 - 32x	61.5 55.75	0.037 0.122	1.78 ppm 6.80 ppm	55.23.34 55.5302
	Bag #6 KC4 - 8x 4 - 32x	10. 4	— 0.122	0.49 ppm	5.14
	Std 6.11 ppm 3x10 ⁴ 100 ppm 4-8x10 ⁴	51 18.5			



CHROMATOGRAPHIC ANALYSIS LOG

Project No. 1002 Date 7-17-82 Analyst TR

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
12.00	Poplar 1.000000 Test 3 Run 2				100% 1576 (1/2)
	B ₂ #8 124-8x Q - 32x	9 4325	.029 .122	0.261 ppm 5.28 ppm	158 - 15.14 178 - 411.51
	B ₂ #10 124-8x Q - 32x	1475 46	.029 .122	0.430 ppm 5.61 ppm	158 - 21.61 178 - 432.74
	B ₂ #34 124-8x Q - 32x	145 505	.029 .122	0.421 ppm 6.16 ppm	158 - 24.39 178 - 480.56
	B ₂ #18 124-8x Q - 32x	140 5	.029 .122	0.41 ppm	



CHROMATOGRAPHIC ANALYSIS LOG

5-000000-2a



Scott Environmental Technology Inc.

Project No. 1922 Date 7-17-80 Analyst TCR

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	Std 6.11 ppm 30x 1.00 ppm 16x Trace Background for Inert Std @ Dinner Direct Unit Test # 8 in 2	545 19			
	Bag #1 16x - 16x 4 - 164x	2575 10075	0.059 0.222	1.52 ppm 13.49 ppm	1.93 x58 = 8216 x78 = 105195
	Bag #15 16x - 32x 4 - 164x	118 30 118 715	.118 .222	3.54 ppm 15.82 ppm	6.01 x58 = 505.52 x78 = 1233.77
	Bag #21 16x - 32x 4 - 164x	3175 605	.118 .222	3.75 ppm 13.43 ppm	4.82 x58 = 217.50 x78 = 1047.62
	Bag #22 16x - 32x 4 - 164x	40 2.5	.111	.25 ppm	178 = 1750
	Std 6.11 ppm 30x 1.00 ppm 16x	50 18			

CHROMATOGRAPHIC ANALYSIS LOG

B. J. J. J. J.

Project No. 1500

Date 7-18-80

Analyst TB

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	Std 6.11 ppm 32x 100 ppm 10x 100% line	5.2			
	B. J. J. J. J.	5.5			
	B. J. J. J. J.	3			
	B. J. J. J. J.	6.5			
	B. J. J. J. J.	4			
	Std 6.11 ppm 32x 100 ppm 10x Temp 100%	5.2 19			



CHROMATOGRAPHIC ANALYSIS LOG

10/10/92

Project No. 1922 Date 7/18/92 Analyst JLB

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	Supermelt Q12 Run #4 Test #4				
	Box #9 104 - 16x φ - 64x	58 77.5	0.057 0.140	3.31 ppm (3.34) 18.00 (4.77)	158 = 180.70 78 = 150.00
	Box #10 104 - 64x φ - 128x	30 41	0.028 0.480	0.84 (6.75) 9.68 (17.85)	158 341.5 x 78 13.00
	Box #17 104 - 32x φ - 64x	42 40.5	0.114 0.1370 .480	4.19 (4.70) 19.44 (17.61)	158 = 211.32 x 78 13.7358
	Box #23 104 (unlabeled) 104 - 32x φ - 16x	3 30.5	0.029 0.06	0.87 ppm 1.83 ppm	158 341.5 x 78 13.00
	Std cell 104 32x 104 16x 104 32x	50 18	0.120 0.057		



CHROMATOGRAPHIC ANALYSIS LOG

Project No. 1920

Date 1-18-80

Analyst AB

B. Chikhami

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	Nagel's Digestion 100% 100% 2				
	Box # 14 10x 32x	45	0.051	257.000	258. = 19400
	Box # 19 10x 32x	3675	.120	414	418 = 343.98
	Box # 19 10x 32x	35	0.114	3.99.000	458 = 221.92
	Box # 19 10x 32x	475	.120	570	470 = 4446
	Box # 19 10x 32x	79	0.057	450	458 = 221.92
	Box # 19 10x 32x	2575	.240	618	470 = 4446
	Std Cell from 100% 100% 2	48			
	Std Cell from 100% 100% 2	185			
	Box # 22 10x 32x	110			
	Box # 22 10x 32x	285			
	Std Cell from 100% 100% 2	615			



CHROMATOGRAPHIC ANALYSIS LOG

 Project No. 1122 Date 7-18-80 Analyst RS

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
04:05:53	Neg. Dyeing Tank Run # 1, 100% dioxin Out 10X	477.5	384	182.4 gm	182.4 gm



CHROMATOGRAPHIC ANALYSIS LOG

B. J. H. H. H. H. H.

Project No. 1922

Date 7-22-80

Analyst J.B.

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
10:00	124.5 gms of Soil 0.4 x 10 ³	59.5	8.06		
	200 g 3000 30 x 10 ³	2	1.03	200 ppm	
	Agilent 1000000000 30.00 Concentration 1.00				Agilent 1000000000 1000000000 with calibration is 740 of the total specification note was found in Hindus to 1000000000
1) collected at ground level	Edges of pit near inlet of DU #1-2 30 x 10 ³	44.5	1.03	4584 ppm	
2)	Middle of Pit containing 30 x 10 ³	26	1.03	2675 ppm	
3)	Near lowest depth near of (1000000000-2) 4 x 10 ³	7	0.029	9.16 ppm	
4)	Base of trenching 30 x 10 ³	15	1.03	15.55 ppm	
5)	Surface (Location 4 x 10 ³)	8.5	0.029	1.10 ppm	Good range



CHROMATOGRAPHIC ANALYSIS LOG

 Project No. 1822 Date 7-26-88 Analyst MB

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	Box 12 4/103	1.5	129		
	Box 8 1008 4/103	30	129	384 ppm	
	Still 1215 1008 4/103	55			
Cell 157	Test th Negl. W. Tank 17810 1008 4/103	33	482	13590	474 ft ³ - 100 ppm
Cell 410	Test 1008 4/103 32103 1008 4/103	32.5	103	3345 x 10 334.5 ppm	100 ft ³
	Still 1215 1008 4/103	54	103		



CHROMATOGRAPHIC ANALYSIS LOG

Project No. 6100 Date 7-22-88 Analyst TD

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
-700	Naphthalene R & S in Samples Collected				
	6100-801				
	300 1005-801	66	186		
1)	Edge of spot in sample of 500 minutes 1005-801	36 36	186 186	66.90 ppm	Partial filling and status, one common solvent
2)	Top of 1005-801 (check area) 3005	89	0.93	36.27 ppm	A. Dist. Top 88.9%
3)	Non-water transfer 3005	12.5	0.93	11.63 ppm	
4)	Bottom of 1005-801 3005	29.5	0.93	27.44 ppm	
5)	Sample #1, 1005	32	0.116	3.72 ppm	Good range
6100 6105-801	Nap Dist. Transfer 1005-801 No. Dist. (0.32 x 10 ³)	30	.93	27.90 ppm	1.354 ft ³ - 0.001



CHROMATOGRAPHIC ANALYSIS LOG

Project No. 1933 Date 7-29-80 Analyst TB

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
4:20 PM 9/30/80	Std 1005 exp 4 C-12.3	6.8	1.82		
	Mac Dry Tissue Test #4 1005 C-12.3	3.2	0.45		1.5% P ₁₀ exp 4
	Std 1005 Background 1005 C-12.3	6.5	0.16	0.754 exp	
	Exp 3 Background 1005 C-12.3	7.5	0.16	0.810 exp	
	Std 1005 exp 4 C-12.3	6.3	1.94		
4:20 PM 11/20/81	Logg. Micro-Ret. exp 4 1005 C-12.3	6.0	1.94	116.40 exp	Det. 11/20/81 Logg. Micro-Ret. exp 4 1005 C-12.3
1)	Hyd. 1005 of Nucleic Acids 1005 C-12.3	43.5	0.97	42.20 exp	Running Logg. Micro-Ret. exp 4 1005 C-12.3
3)	Nucleic Acid Sample 32 x 1005	11	0.97	106.78 exp	A. 11/20/81 exp 4



CHROMATOGRAPHIC ANALYSIS LOG

Project No. 1922

Date 1/11/88

Analyst VES

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
4)	Box of Well Chem 8 32x10 ³	16	0.97	15.52 ppm	Good sample
3)	Sample #1 8x10 ³	8.5	.343	2.07 ppm	
	Map D. 8 Tube Test #5	71	0.77	34.77 ppm	lots of sandy gravel 1385 ft = 1385
	Alcohol #1 B K @ 4x10 ³	140	—	—	
	Still 1.725 ppm @ 4x10 ³	64			
	Wash #1 B K @ 4x10 ³	7	.121	0.85 ppm	
	Wash #2 B K @ 4x10 ³	8	.121	0.87 ppm	
	Wash #3 B K @ 4x10 ³	10	.121	1.21 ppm	
	Soft water Cooling Tower Wash #1 2x10 ³	1	.06	0.06 ppm	
	Soft water Cooling Tower Wash #2 1x10 ³	1			
	Wash #3 4x10 ³	5			



CHROMATOGRAPHIC ANALYSIS LOG

 Project No. 1192 Date 7-22-98 Analyst TB

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	<i>Heads = 4 RT made of Cooling Tower 1/10/98</i> <i>Std 100.5 gmp. @ 100.5 gmp.</i> <i>Heads 100.5 gmp. 30.35 gmp.</i>	1 60 30.35	2.77	29.34 gmp	



CHROMATOGRAPHIC ANALYSIS LOG

 Project No. 1922 Date 7-24-80 Analyst YB

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	Std 122.5 μ m ϕ 64x10 ³	59.5	2.06		
	Bag Background 102 @ 1x10 ³		.033		
	Bag #12	9			
	Bag #21	12			
	Bag #2	2			
	Bag #11	1			
	Bag #8	2			
	Bag #7 @ 2x10 ³ (None)	2			
	Bag #10 "	NO			
	Bag #20 "	2			
	Bag #13 - old (1x10 ³)	2.5			
	Bag #17.	15			



CHROMATOGRAPHIC ANALYSIS LOG

Project No. 1922 Date 7-24-80 Analyst

Time	Sample Identification	Peak Height/Area	Concentration Factor	Concentration	Comments
	100l Bag #12 2×10^3	72	1000 1000		
	100l Bag #7 "	45		0.31 gm	
	100l Bag #11 "	11			
	100l Bag #1 "	60			
	Std 122.5 gm 64×10^3				
	Test # NOT Voided 16×10^3	15			
	Test # NOT 64×10^3 16 Oil	76	2.06	156.56 gm	.420 μt^3 - conc. val.
	Test #8 32×10^3	11.5	1000 1003	47.38 11.86 gm	1.101 μt^3 = conc. val.



APPENDIX D
TRACER GAS METHOD DEVELOPMENT



Scott Environmental Technology Inc.

APPENDIX D

TRACER GAS METHOD DEVELOPMENT

D.1 Tracer Gas Selection

The initial consideration when using the tracer gas method is the choice of a suitable gas. There are several criteria used in the selection: First, the tracer gas must not be present in the atmosphere at the sampling location. Second, the tracer gas must be separable from other components in the background at the sampling location and quantifiable on the same GC column without interfering with the elution of the compound(s) of primary interest. The tracer gas should also be readily available, transportable, economically feasible, and safe for the given usage situation.

For the determination of benzene emissions at secondary by-products plants, isobutane is the recommended tracer gas. The second choice for a tracer gas is a halogenated hydrocarbon. At secondary by-products plants the hydrocarbons in the background atmosphere are almost exclusively emissions from the coking operation and neither isobutane nor halogenated hydrocarbons are present to any significant degree. Isobutane was chosen over a halogenated hydrocarbon on the basis of chromatographic elution characteristics. Isobutane elutes well before the benzene peak thus eliminating any interference when using a temperature program for the chromatographic analysis.

The separation of isobutane from mixtures containing concentrations of hydrocarbons typical of secondary by-products plants was verified by spiking samples collected at different sources in a secondary by-products plant with various concentrations of isobutane and performing

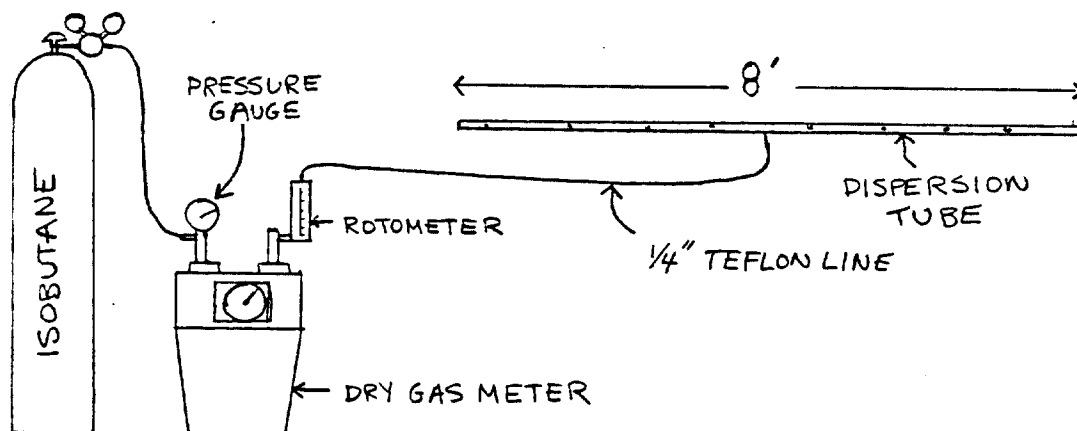


a temperature program of chromatographic analysis to achieve the desired degree of separation. In all cases the desired separation was achieved.

D-2 Dispersion Apparatus

The apparatus for the dispersion of tracer consists of a cylinder of the tracer gas connected to a dry gas meter, a rotameter and a dispersion tube. All necessary connecting lines are Teflon.

Two different dispersion tube configurations were tested, both were constructed from 1/4" O.D. stainless steel tubing. The first tube tested was 8' long with the tracer source connected to one end of the tube. The tube contained holes every 19" which were progressively larger moving away from the gas source. The hole size ranged from 0.062" to 0.031". The second tube was 8' long in two 4' sections which are connected via a T-joint to each other and to the tracer gas source. This dispersion tube has 0.041" holes every 19" and the ends are capped.

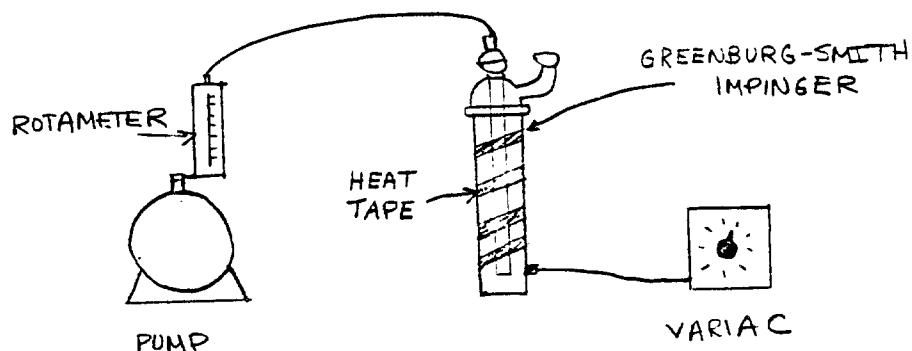


Of the two types of dispersion tubes tested the latter described was more efficient for the dispersion of the tracer. This judgement was made by visual inspection of the holes in each tube while isobutane was flowing at



0.1 CFM. At this rate isobutane can be seen as it leaves the dispersion tube and differences in the relative volume leaving each hole are visually discernible. The first configuration had all gas coming out of the first 2 holes, whereas the second configuration had uniform emissions from each orifice.

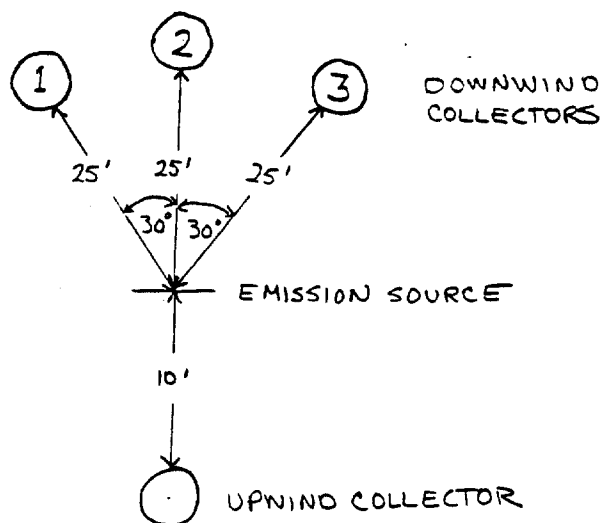
Benzene was also released in two ways; by evaporation and a heated bubbler. Both methods proved adequate for experimental determinations. When evaporation was used to release benzene, a stainless steel pan 16" x 24" x 1/2" was employed to contain the benzene. During an experimental determination benzene was added to the pan in 50 cc aliquots at intervals frequent enough to maintain a constant surface area of benzene. This was done in order to keep the emission of benzene at a constant rate. However, this evaporation method proved unsatisfactory on days when the wind speed exceeded 15-20 MPH due to the changing evaporation rate resulting from gusting wind. A more steady emission of benzene was achieved by using a heated bubbler. The bubbler system consisted of a 500 cc impinger of the Greenburg-Smith design wrapped with a heat tape. The impinger was kept at a constant temperature below the boiling point of benzene. A rubber diaphragm pump was used to push atmospheric air through a bubbler. Flow was regulated with a rotameter.



It was necessary to add more benzene during an experimental run, because the emission rate drops substantially if the benzene level drops too low in the impinger. The frequency of addition and the quantity of benzene per addition are dependent on the emission rate being used. For our determinations it was necessary to add 50 cc of benzene at intervals of approximately 10 minutes.

D-3 Experimental Determinations

An experiment consists of the release of a known amount of isobutane and benzene simultaneously. Samples are collected along a 30° arc, 25 feet downwind from the source of the emissions.



Initially samples were grab samples collected in clean one liter glass gas flasks. Later samples were integrated over a 1/2 hour period and collected in clean 10-liter Tedlar bags via Emission Measurements Air Quality Sampler with a flow rate of 10 LPH.

In initial determinations, portions of actual presurvey samples containing 62% benzene were released in an effort to simulate



the type of sample which would be encountered in the field. Various amounts of the sample mixture from 0.20 to 10 cc were released and samples were collected downwind in 1-liter gas flasks. When these samples were analyzed the amount of benzene detected was very small, approximately 20 ppb. From this it was apparent that it would be necessary to release significantly more benzene in order to produce the necessary concentration at the sampling location so that quantitative mass to mass ratios could be calculated.

Because of the necessity of releasing more benzene and avoiding the foul odor which the high concentration benzene field samples possessed, it was decided that pure benzene be used for all subsequent determinations.

For the next series of experiments evaporation as previously described was used to release benzene. This series of experiments produced results accurate to within 10% of the theoretical mass to mass ratios with a minimum benzene emission of 0.54 lb/hr for the series. These experiments were performed on days when the wind speed was light (5 - 10 MPH) and the wind direction was steady (See Table D-1).

The next experiment was designed to test the variations which might be introduced when the wind speed and direction were less than favorable. On the day selected the wind speed was 20-25 MPH and the direction was 180° variable due to a changing weather system. The rate of evaporation of the benzene was noticeably affected by the conditions as were the dispersion patterns of the emissions. Erratic results were produced by the meteorological stress on key experimental variables. Calculated mass to mass ratios differed from the theoretical value from 15% to as much as 56%, demonstrating the effect of high and variable winds on the technique. In order to reduce stress on the experiment the benzene bubbler as described was used to provide



a steady source of benzene emission at a rate that would be independent of meteorological conditions. On the day chosen to use the bubbler system the wind speed was 15-20 MPH and the direction was steady. Favorable results were obtained despite the relatively strong wind demonstrating that the tracer technique is valid in winds up to 20 MPH depending on the sampling location (see Table D-1).

D-4 Summary

When using the tracer gas method it is necessary to verify that the tracer gas is detectable at the sampling location of choice as the method is somewhat dependent upon meteorological conditions. The method works best when the wind speed is light to moderate, 5-15 MPH, and the wind direction is steady. When the wind speed exceeds approximately 20 MPH or if there is no wind and/or the wind direction is too variable, dispersion patterns conducive to accurate sampling are disturbed and quantitative mass to mass relationships are difficult to establish. The upper limit of stress with respect to meteorological conditions can be examined by the spread of mass to mass ratios for each individual sample for a given sampling run. If the calculated ratios are inconsistent or the deviation between each calculated ratio and their mean is greater than 20%, it would be necessary to seek an explanation based on process variations or meteorological conditions or to void the sampling run and possibly suspend sampling until conditions are more favorable.

D-5 Field Sampling Strategy

The program for a sampling run will generally involve the collection of triplicate downwind samples and a single point upwind sample. Actual sampler locations will be determined by the gas chromatograph on



site. Grab samples will be collected in glass flasks and analyzed to determine the benzene concentration in the vicinity of the source to be tested. This information will be correlated with wind speed and direction to choose the exact sampler locations. In the ideal case downwind samplers will be equidistant from the source and along approximately a 30° arc.

Two sets of samples will be integrated over separate one-half hour periods and together constitute a single test. Samples will be collected by Environmental Measurements AQS II sampling system into clean 10-liter Tedlar bags. Tedlar bags to be reused for sampling will be flushed three times with nitrogen and allowed to sit overnight three quarters full. Prior to their next use each will be analyzed for benzene content.

The tracer gas dispersion apparatus will be positioned over the source to be tested as near as possible to the actual emissions. Ideally the dispersion tube or support member will span the source of the emissions at its center.



TABLE D-1

EXPERIMENTAL DATA

Release Rate g/min	Benzene Release Method	Sample Type	Wind Speed	Wind Direction	Theoretical T ϕ /ic ₄	ϕ /ic ₄ #1	ϕ /ic ₄ #2	ϕ /ic ₄ #3	Average
ϕ 0.027 ic ₄ 5.26	Evaporation	Grab	0-5 MPH	Steady	0.005	*NO	NO	NO	---
ϕ 0.993 ic ₄ 8.27	Evaporation	Grab	0-5 MPH	Steady	0.120	*NO	NO	NO	---
ϕ 4.05 ic ₄ 7.16	Evaporation	Grab	0-5 MPH	Steady	0.59	0.64	0.64	0.65	0.645
ϕ 9.40 ic ₄ 6.38	Evaporation	Integrated	5-10 MPH	Steady	1.47	1.57	1.43	---	1.50
ϕ 10.85 ic ₄ 13.59	Evaporation	Integrated	20-25 MPH	Variable	0.80	1.29	1.82	0.94	1.35
ϕ 9.40 ic ₄ 8.25	Bubbler	Integrated	15-20 MPH	Steady	1.14	1.40	1.93	1.02	1.18
ϕ 6.33 ic ₄ 6.48	Bubbler	Integrated	0-5 MPH	Steady	0.91	0.97	0.96	0.96	0.96
ϕ 6.48 ic ₄ 6.48	Bubbler	Integrated	0-5 MPH	Steady	1.00	0.91	0.86	0.89	0.89

 ϕ - Benzeneic₄ - Isobutane

* No benzene, only isobutane detected.



APPENDIX E
FIELD AUDIT REPORT



Scott Environmental Technology Inc.

#65

FIELD AUDIT REPORT

PART A - To be filled out by organization supply unit cylinders (RTI)

1. Organization supplying audit sample(s) and shipping address

Research Triangle Institute, Post Office Box 12194, Research Triangle Park, NC

2. Audit supervisor, organization, and phone number (EMB Technical Manager)

Dan Bivens, EPA

2770

3. Shipping instructions - Name, Address, Attention

Scott Environmental Technology

Post Office Box D-11

Plumsteadville, PA 18949

ATTN: Bob Denyszyn

4. Guaranteed arrival date for cylinders 6/10/80

5. Planned shipping date for cylinders 6/10/80

6. Details on audit cylinders for last analysis

	Low Conc.	High Conc.
a. Date of last analysis	<u>5/30/80</u>	<u>5/30/80</u>
b. Cylinder number	<u>B-1372</u>	<u>B-921</u>
c. Cylinder pressure, PSI	<u>1750</u>	<u>1500</u>
d. Audit gas(es)/balance gas	<u>Benzene/N₂</u>	<u>Benzene/N₂</u>
e. Audit gas(es) ppm	<u>7.93</u>	<u>154.4</u>
f. Cylinder construction	<u>Steel</u>	<u>Steel</u>

PART B - To be filled out by audit supervisor

1. Organic chemical manufacturing process Coke Oven By-Product
Recovery Plant
2. Location of audit Bethlehem, Pa
3. Name of individual audit and organization Tom Bernstein, Scott
Environmental Tech.
4. Audit results

	Low Conc.	High Conc.
--	-----------	------------

a. Cylinder number

<u>B-1372</u>	<u>B-921</u>
---------------	--------------

b. Cylinder pressure before audit, psi

<u>1750</u>	<u>1500</u>
-------------	-------------

c. Cylinder pressure after audit, psi

<u>? ..</u>	<u>1400</u>
-------------	-------------

d. Audit date and measured concentration, ppm

Date

Analysis #1

7/8/507.66137.36

Analysis #2

7/8/307.67134.67

Analysis #3

? ..7.76134.21e. RTI concentration, ppm
(Part A, 6d)7.93154.4

f. Audit accuracy*

Page E-3

Analysis #1	<u>- 2.4</u>	<u>-14.92</u>
Analysis #2	<u>-3.3</u>	<u>-12.78</u>
Analysis #3	<u>-2.1</u>	<u>-13.08</u>

* Percent accuracy = $\frac{\text{Measured Conc.} - \text{RTI Conc.}}{\text{RTI Conc.}} \times 100$

g. Problems detected (if any): Scott is the owner. info
prepared cylinder = R-921 serial 1000000. Then
it's serial number is 134.8 ppm. Scott's gas
dept. analyzed cylinder 10 times on 7/18/90.
The results are attached.

SCOTT ENVIRONMENTAL TECHNOLOGY, INC.
Plumsteadville, Pennsylvania 18949

INTERDEPARTMENTAL MEMORANDUM

TO: D.F.DATE: July 18 / 1980FROM: P.K.C.SUBJECT: Analysis of Audit
of Cylinder
#B-92PROJECT # 1922

The Primary Standard is taken from
Gas Dept. & ^{TS} Conc. is 110.9 ppm.

The audit cylinder Conc. is 134.8 ppm
Standard deviation in analysis ± 1.1 ppm

Individual analysis results are

- | | |
|--------|-----------|
| ① → | 133.8 ppm |
| (2) → | 135.2 ppm |
| (3) → | 135.5 ppm |
| (4) → | 133.8 ppm |
| (5) → | 136.4 ppm |
| (6) → | 135.9 ppm |
| (7) → | 133.1 ppm |
| (8) → | 133.8 ppm |
| (9) → | 135.2 ppm |
| (10) → | 135.7 ppm |

Mean 134.8 ppm

STD. Deviation ± 1.1 ppm.

[Signature]
7/18/80

APPENDIX F
PROJECT PARTICIPANTS



Scott Environmental Technology Inc.

APPENDIX F

PROJECT PARTICIPANTS

The following people participated in some phase of the sampling program at Bethlehem Steel.

From Scott Environmental Technology, Inc.:

Tom Bernstiel, Chemist
Jack Carney, Chemist
P. K. Chattopadhyay, Chemist
Dan FitzGerald, Manager, Eastern Operations
Kevin Gordon, Technician
Carolyn Graham, Chemical Engineer
Scott Henderson, Environmental Scientist
Lou Reckner, Vice President & General Manager
Joe Wilson, Senior Technician

From Research Triangle Institute:

Ralph Roberson
Dave Marsland

From U. S. Environmental Protection Agency

Lee Beck
Dan Bivins



APPENDIX G
EPA METHOD 110



Scott Environmental Technology Inc.

(f) All continuous monitoring systems used in accordance with this section are to complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.

(g) Owners or operators of all continuous monitoring systems installed in accordance with this subpart shall check the zero and span drift at least once daily in accordance with the method prescribed by the manufacturer of such systems unless the manufacturer of such systems recommends adjustments at shorter intervals, in which case such recommendations shall be followed. The daily span check is to be conducted with reference gas containing a concentration of benzene determined to be equivalent to the emission limit for that source based on the emission tests required by § 61.94.

(h) The calibration is to be done with either—

(1) A calibration mixture prepared from the liquids and gases specified in Section 5.2.1 and 5.2.2 of Test Method 110 and in accordance with Section 7.1 of Test Method 110; or

(2) A calibration gas cylinder standard containing the appropriate concentration of benzene. The gas composition of the calibration gas cylinder standard is to have been certified by the manufacturer. The manufacturer must have recommended a maximum shelf life for each cylinder so gas standards will not be used if their concentration has changed greater than ± 5 percent from the certified value. The data of gas cylinder preparation, certified benzene concentration, and recommended maximum shelf life must have been affixed to the cylinder before shipment from the manufacturer to the buyer. If a gas chromatograph is used as the continuous monitoring system, these gas mixtures may be used directly to prepare a chromatograph calibration curve as described in Section 7.2 of Test Method 110 for certification of cylinder standards and for establishment and verification of calibration standards.

(i) After receipt and consideration of written application, the Administrator may approve use of an alternative or equivalent continuous monitoring system, alternative monitoring procedures, or alternative monitoring requirements.

(Sec. 114, Clean Air Act as amended [42 U.S.C. 7414])

§ 61.96 Recordkeeping requirements.

(a) The owner or operator of each source to which this subpart applies shall maintain daily records of the monitoring information specified in § 61.95(a).

(b) Records are to be retained at the source and made available for inspection by the Administrator for a minimum of 2 years.

(Sec. 114, Clean Air Act as amended [42 U.S.C. 7414])

Appendix B—Test Methods

Method 110. Determination of Benzene From Stationary Sources

Performance of this method should not be attempted by persons unfamiliar with the operation of a gas chromatograph, nor by those who are unfamiliar with source sampling, because knowledge beyond the scope of this presentation is required. Care must be exercised to prevent exposure of sampling personnel to benzene, a carcinogen.

1. Applicability and Principle

1.1 Applicability. This method applies to the measurement of benzene in stack gases from processes as specified in the regulations. The method does not remove benzene contained in particulate matter.

1.2 Principle. An integrated bag sample of stack gas containing benzene and other organics is subjected to gas chromatographic (GC) analysis, using a flame ionization detector (FID).

2. Range and Sensitivity

The range of this method is 0.1 to 70 ppm. The upper limit may be extended by extending the calibration range or by diluting the sample.

3. Interferences

The chromatograph columns and the corresponding operating parameters herein described normally provide an adequate resolution of benzene; however, resolution interferences may be encountered on some sources. Therefore, the chromatograph operator shall select the column and operating parameters best suited to his particular analysis problem, subject to the approval of the Administrator. Approval is automatic provided that the tester produces confirming data through an adequate supplemental analytical technique, such as analysis with a different column or GC/mass spectroscopy, and has the data available for review by the Administrator.

4. Apparatus

4.1 Sampling (see Figure 110-1). The sampling train consists of the following components:

4.1.1 Probe. Stainless steel, Pyrex * glass, or Teflon tubing (as stack temperature permits), equipped with a glass wool plug to remove particulate matter.

4.1.2 Sample Lines. Teflon, 6.4 mm outside diameter, of sufficient length to connect probe to bag. Use a new unused piece for each series of bag samples that constitutes an emission test and discard upon completion of the test.

4.1.3 Quick Connects. Stainless steel, male (2) and female (2), with ball checks (one

pair without) located as shown in Figure 110-1.

4.1.4 Tedlar or aluminized Mylar bags, 100 L capacity, to contain sample.

4.1.5 Bag Containers. Rigid leakproof containers for sample bags with covering to protect contents from sunlight.

4.1.6 Needle Valve. To adjust sample flow rate.

4.1.7 Pump. Leak-free with minimum of 2 L/min capacity.

4.1.8 Charcoal Tube. To prevent admission of benzene and other organics to the atmosphere in the vicinity of samplers.

4.1.9 Flow Meter. For observing sample flow rate; capable of measuring a flow range from 0.10 to L/min.

4.1.10 Connecting Tubing. Teflon, 6.4 mm outside diameter, to assemble sampling train (Figure 110-1.)

4.2 Sample Recovery. Teflon tubing, 6.4 mm outside diameter, is required to connect chromatograph sample loop for sample recovery. Use a new unused piece for each series of bag samples that constitutes an emission test and discard upon conclusion of analysis of those bags.

4.3 Analysis. The following equipment is needed:

4.3.1 Gas Chromatograph. With FID, potentiometric strip chart recorder and 1.0 to 2.0 mL sampling loop in automatic sample valve. The chromatographic system shall be capable of producing a response to 0.1 ppm benzene that is at least as great as the average noise level. (Response is measured from the average value of the base line to the maximum of the waveform, while standard operating conditions are in use.)

BILLING CODE 6560-01-M

* Mention of trade names or specific products does not constitute endorsement by the U.S. Environmental Protection Agency.

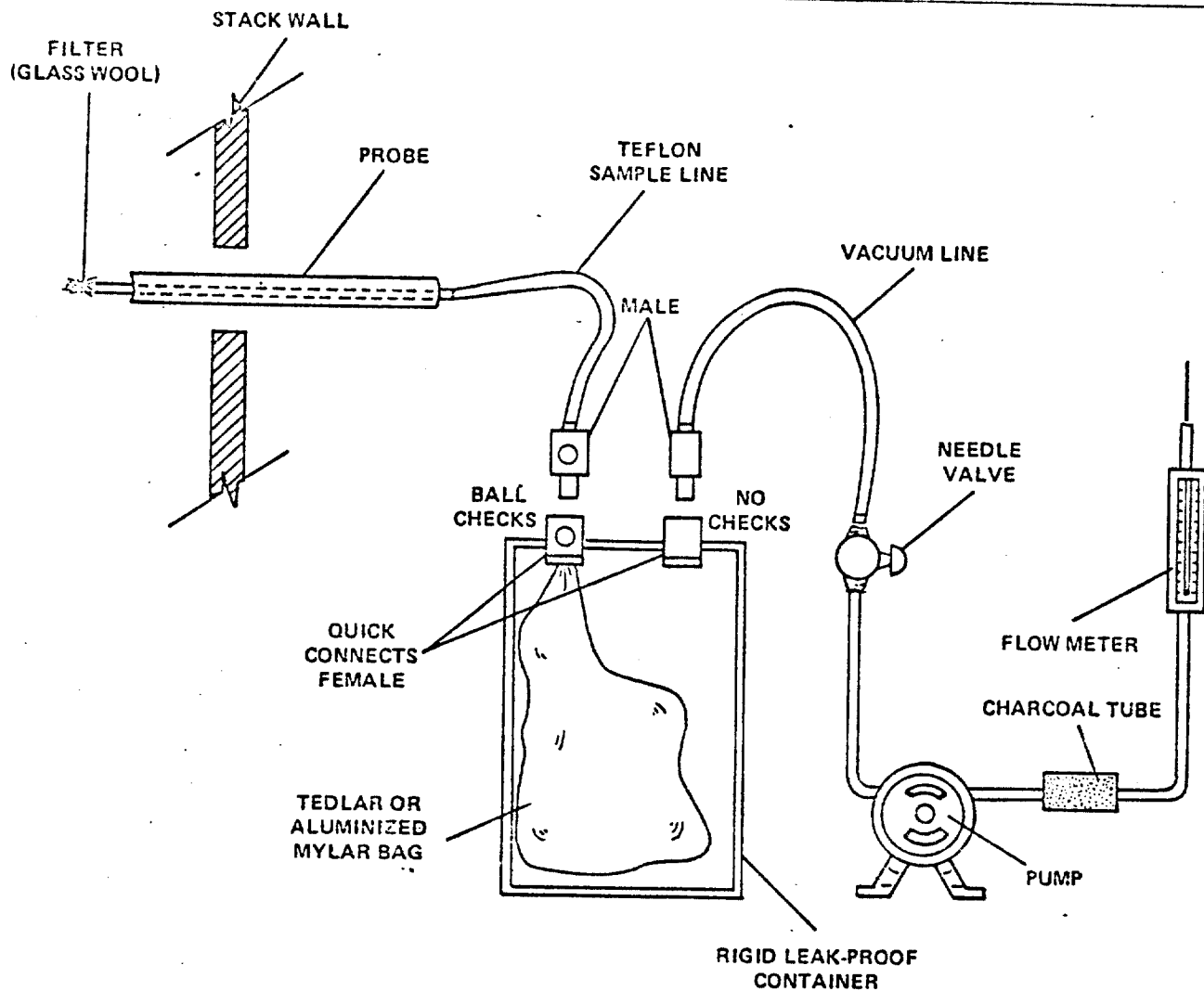


Figure 110-1. Integrated-bag sampling train. (Mention of trade names or specific products does not constitute endorsement by the Environmental Protection Agency.)

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4.3.2 Chromatographic Columns. Columns as listed below. The analyst may use other columns provided that the precision and accuracy of the analysis of benzene standards are not impaired and he has available for review information confirming that there is adequate resolution of the benzene peak. (Adequate resolution is defined as an area overlap of not more than 10 percent of the benzene peak by an interferent peak. Calculation of area overlap is explained in Appendix E, Supplement A: "Determination of Adequate Chromatographic Peak Resolution.")

4.3.2.1 Column A: Benzene in the Presence of Aliphatics. Stainless steel, 2.44 m by 3.2 mm, containing 10 percent 1,2,3-tris (2-cyanoethoxy) propane (TCEP) on 80/100 Chromosorb P AW.

4.3.2.2 Column B: Benzene With Separation of the Isomers of Xylene. Stainless steel, 1.83 m by 3.2 mm, containing 5 percent SP 1,200/1.75 percent Bentone 34 on 100/120 Suplecoport.

4.3.3 Flow Meters (2). Rotameter type, 100 mL/min capacity.

4.3.4 Gas Regulators. For required gas cylinders.

4.3.5 Thermometer. Accurate to 1° C, to measure temperature of heated sample loop at time of sample injection.

4.3.6 Barometer. Accurate to 5 mmHg, to measure atmospheric pressure around gas chromatograph during sample analysis.

4.3.7 Pump. Leak-free, with minimum of 100 mL/min capacity.

4.3.8 Recorder. Strip chart type, optionally equipped with either disc or electronic integrator.

4.3.9 Planimeter. Optional, in place of disc or electronic integrator, on recorder, to measure chromatograph peak areas.

4.4 Calibration. Sections 4.4.2 through 4.4.5 are for the optional procedure in Section 7.1.

4.4.1 Tubing. Teflon, 6.4 mm outside diameter, separate pieces marked for each calibration concentration.

4.4.2 Tedlar or Aluminized Mylar Bags. 50 L capacity, with valve; separate bag marked for each calibration concentration.

4.4.3 Syringes. 1.0 μ L and 10 μ L, gas tight, individually calibrated to dispense liquid benzene.

4.4.4 Dry Gas Meter. With Temperature and Pressure Gauges. Accurate to ± 2 percent, to meter nitrogen in preparation of standard gas mixtures, calibrated at the flow rate used to prepare standards.

4.4.5 Midget Impinger/Hot Plate Assembly. To vaporize benzene.

5. Reagents

Use only reagents that are of chromatographic grade.

5.1 Analysis. The following are needed for analysis:

5.1.1 Helium or Nitrogen. Zero grade, for chromatograph carrier gas.

5.1.2 Hydrogen. Zero grade.

5.1.3 Oxygen or Air. Zero grade, as required by the detector.

5.2 Calibration. Use one of the following options: either 1.2.1 and 5.2.2, or 5.2.3.

5.2.1 Benzene. 99 Mol Percent Pure. Certified by the manufacturer to contain a

minimum of 99 Mol percent benzene; for use in the preparation of standard gas mixtures as described in Section 7.1.

5.2.2 Nitrogen. Zero grade, for preparation of standard gas mixtures as described in Section 7.1.

5.2.3 Cylinder Standards (3). Gas mixture standards (50, 10, and 5 ppm benzene in nitrogen cylinders). The tester may use cylinder standards to directly prepare a chromatograph calibration curve as described in Section 7.2.2, if the following conditions are met: (a) The manufacturer certifies the gas composition with an accuracy of ± 3 percent or better (see Section 5.2.3.1). (b) The manufacturer recommends a maximum shelf life over which the gas concentration does not change by greater than ± 5 percent from the certified value. (c) The manufacturer affixes the date of gas cylinder preparation, certified benzene concentration, and recommended maximum shelf life to the cylinder before shipment to the buyer.

5.2.3.1 Cylinder Standards Certification. The manufacturer shall certify the concentration of benzene in nitrogen in each cylinder by (a) directly analyzing each cylinder and (b) calibrating his analytical procedure on the day of cylinder analysis. To calibrate his analytical procedure, the manufacturer shall use, as a minimum, a three-point calibration curve. It is recommended that the manufacturer maintain (1) a high-concentration calibration standard (between 50 and 100 ppm) to prepare his calibration curve by an appropriate dilution technique; and (2) a low-concentration calibration standard (between 5 and 10 ppm) to verify the dilution technique used. If the difference between the apparent concentration read from the calibration curve and the true concentration assigned to the low-concentration standard exceeds 5 percent of the true concentration, the manufacturer shall determine the source of error and correct it, then repeat the three-point calibration.

5.2.3.2 Verification of Manufacturer's Calibration Standards. Before using, the manufacturer shall verify each calibration standard by (a) comparing it to gas mixtures prepared (with 99 Mol percent benzene) in accordance with the procedure described in Section 7.1 or by (b) having it analyzed by the National Bureau of Standards. The agreement between the initially determined concentration value and the verification concentration value must be within ± 5 percent. The manufacturer must reverify all calibration standards on a time interval consistent with the shelf life of the cylinder standards sold.

5.2.4 Audit Cylinder Standards (2). Gas mixture standards with concentrations known only to the person supervising the analysis of samples. The audit cylinder standards shall be identically prepared as those in Section 5.2.3 (benzene in nitrogen cylinders). The concentrations of the audit cylinder should be: one low-concentration cylinder in the range of 5 to 20 ppm benzene and one high-concentration cylinder in the range of 100 to 300 ppm benzene. When available, the tester may obtain audit cylinders by contacting: U.S. Environmental

Protection Agency, Environmental Monitoring and Support Laboratory, Quality Assurance Branch (MD-77), research Triangle Park, North Carolina 27711. If audit cylinders are not available at the Environmental Protection Agency, the tester must secure an alternative source.

6. Procedure

6.1 Sampling. Assemble the sample train as shown in Figure 110-1. Perform a bag leak check according to Section 7.3.2. Join the quick connects as illustrated, and determine that all connections between the bag and the probe are tight. Place the end of the probe at the centroid of the stack, and start the pump with the needle valve adjusted to yield a flow that will more than half fill the bag in the specified sample period. After allowing sufficient time to purge the line several times, connect the vacuum line to the bag and evacuate the bag until the rotameter indicates no flow. At all times, direct the gas exiting the rotameter away from sampling personnel. At the end of the sample period, shut off the pump, disconnect the sample line from the bag, and disconnect the vacuum line from the bag container. Protect the bag container from sunlight.

6.2 Sample Storage. Keep the sample bags out of direct sunlight. Perform the analysis within 4 days of sample collection.

6.3 Sample Recovery. With a new piece of Teflon tubing identified for that bag, connect a bag inlet valve to the gas chromatograph sample valve. Switch the valve to receive gas from the bag through the sample loop. Arrange the equipment so the sample gas passes from the sample valve to a 100-mL/min rotameter with flow control valve followed by a charcoal tube and a 1-in. pressure gauge. The tester may maintain the sample flow either by a vacuum pump or container pressurization if the collection bag remains in the rigid container. After sample loop purging is ceased, always allow the pressure gauge to return to zero before activating the gas sampling valve.

6.4 Analysis. Set the column temperature to 80° C (176° F) for column A or 75° C (167° F) for column B, and the detector temperature to 225° C (437° F). When optimum hydrogen and oxygen flow rates have been determined, verify and maintain these flow rates during all chromatograph operations. Using zero helium or nitrogen as the carrier gas, establish a flow rate in the range consistent with the manufacturer's requirements for satisfactory detector operation. A flow rate of approximately 20 mL/min should produce adequate separations. Observe the base line periodically and determine that the noise level has stabilized and that base-line drift has ceased. Purge the sample loop for 30 sec at the rate of 100 mL/min, then activate the sample valve. Record the injection time (the position of the pen on the chart at the time of sample injection), the sample number, the sample loop temperature, the column temperature, carrier gas flow rate, chart speed, and the attenuator setting. From the chart, note the peak having the retention time corresponding to benzene, as determined in Section 7.2.1. Measure the benzene peak area, A_m , by use of a disc integrator, electronic integrator, or a planimeter. Record A_m and

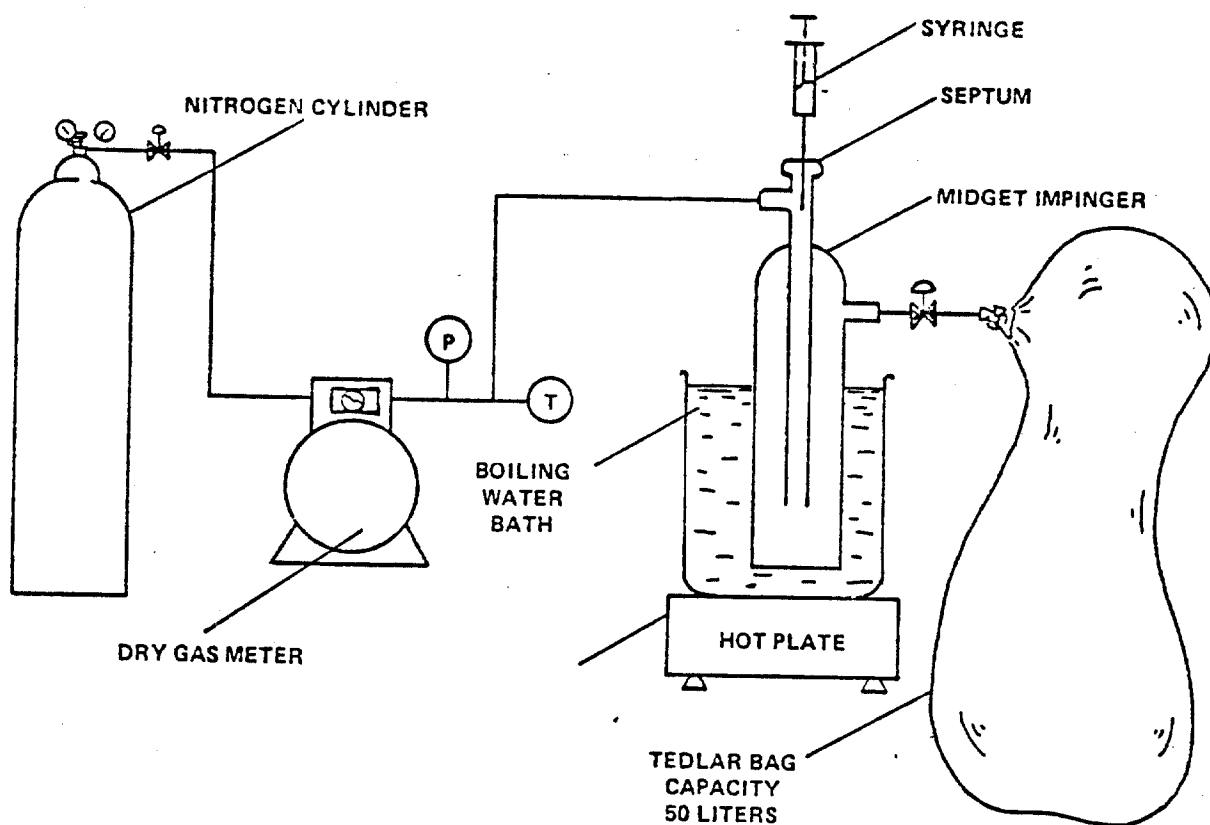


Figure 110-2. Preparation of benzene standards (optional).

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the retention time. Repeat the injection at least two times or until two consecutive values for the total area of the benzene peak do not vary more than 5 percent. Use the average value of these two total areas to compute the bag concentration.

6.5 Determination of Bag Water Vapor Content. Measure the ambient temperature and barometric pressure near the bag. From a water saturation vapor pressure table, determine and record the water vapor content of the bag as a decimal figure. (Assume the relative humidity to be 100 percent unless a lesser value is known.)

7. Preparation of Standard Gas Mixtures, Calibration, and Quality Assurance

7.1 Preparation of Benzene Standard Gas Mixtures. (Optional procedure—delete if cylinder standards are used.) Assemble the apparatus shown in Figure 110-2. Evacuate a 50-L Tedlar or aluminized Mylar bag that has passed a leak check (described in Section 7.3.2) and meter in about 50 L of nitrogen. Measure the barometric pressure, the relative pressure at the dry gas meter, and the temperature at the dry gas meter. While the bag is filling, use the 10 μ L syringe to inject 10 μ L of 99+ percent benzene through the septum on top of the impinger. This gives a concentration of approximately 50 ppm of benzene. In a like manner, use the other syringe to prepare dilutions having approximately 10 ppm and 5 ppm benzene concentrations. To calculate the specific concentrations, refer to Section 8.1. These gas mixture standards may be used for 7 days from the date of preparation, after which time preparation of new gas mixtures is required. (Caution: If the new gas mixture standard is a lower concentration than the previous gas mixture standard, contamination may be a problem when a bag is reused.)

7.2 Calibration.

7.2.1 Determination of Benzene Retention Time. (This section can be performed simultaneously with Section 7.2.2.) Establish chromatograph conditions identical with those in Section 6.4, above. Determine proper attenuator position. Flush the sampling loop with zero helium or nitrogen and activate the sample valve. Record the injection time, the sample loop temperature, the column temperature, the carrier gas flow rate, the chart speed, and the attenuator setting. Record peaks and detector responses that occur in the absence of benzene. Maintain conditions, with the equipment plumbing arranged identically to Section 6.3, and flush the sample loop for 30 sec at the rate of 100 mL/min with one of the benzene calibration mixtures. Then activate the sample valve. Record the injection time. Select the peak that corresponds to benzene. Measure the distance on the chart from the injection time to the time at which the peak maximum occurs. This distance divided by the chart speed is defined as the benzene peak retention time. Since it is quite likely that there will be other organics present in the sample, it is very important that positive identification of the benzene peak be made.

Question.

7.2.2 Preparation of Chromatograph Calibration Curve. Make a gas chromatographic measurement of each standard gas mixture (described in Section 5.2.3 or 7.1.1) using conditions identical with those listed in Sections 6.3 and 6.4. Flush the sampling loop for 30 sec at the rate of mL/min with one of the standard gas mixtures and activate the sample valve. Record C_c , the concentration of benzene injected, the attenuator setting, chart speed, peak area, sample loop temperature, column temperature, carrier gas flow rate, and retention time. Record the laboratory pressure. Calculate A_c , the peak area multiplied by the attenuator setting. Repeat until two consecutive injection areas are within 5 percent, then plot the average of those two values versus C_c . When the other standard gas mixtures have been similarly analyzed and plotted, draw a straight line through the points derived by the least squares method. Perform calibration daily, or before and after each set of bag samples, whichever is more frequent.

7.3 Quality Assurance.

7.3.1 Analysis Audit. Immediately after the preparation of the calibration curve and before the sample analyses, perform the

analysis audit described in Appendix E, Supplement B: "Procedure for Field Auditing GC Analyses."

7.3.2 Bag Leak Checks. While performance of this section is required after bag use, it is also advised that it be performed before bag use. After each use, make sure a bag did not develop leaks by connecting a water manometer and pressurizing the bag to 5 to 10 cm H₂O (2 to 4 in. H₂O). Allow to stand for 10 min. Any displacement in the water manometer indicates a leak. Also, check the rigid container for leaks in this manner. (Note: an alternative leak check method is to pressurize the bag to 5 to 10 cm H₂O or 2 to 4 in. H₂O and allow to stand overnight. A deflated bag indicates a leak.) For each sample bag in its rigid container, place a rotameter in line between the bag and the pump inlet. Evacuate the bag. Failure of the rotameter to register zero flow when the bag appears to be empty indicates a leak.

8. Calculations

8.1 Optional Benzene Standards Concentrations. Calculate each benzene standard concentration (C_c in ppm) prepared in accordance with Section 7.1 as follows:

$$C_c = \frac{B(0.2706)(10^3)}{V_m Y \frac{293}{T_m} \frac{P_m}{760}}$$

$$C_c = 701.9 \frac{BT_m}{V_m Y P_m} \quad (110-1)$$

where:

- B = Volume of benzene injected, microliters.
- V_m = Gas volume measured by dry gas meter, liters.
- Y = Dry gas meter calibration factor, dimensionless.
- P_m = Absolute pressure of the dry gas meter, mmHg.
- T_m = Absolute temperature of the dry gas meter, °K.
- 0.2706 = Ideal gas volume of benzene at 293° K and 760 mmHg L/mL.
- 10^3 = Conversion factor [(ppm)(mL)/μL].

8.2 Benzene Sample Concentrations. From the calibration curve described in Section 7.2.2 above, select the value of C_c that corresponds to A_c . Calculate the concentration of benzene in the sample (C_s in ppm) as follows:

$$C_s = \frac{C_c P_r T_i}{P_i T_r (1 - S_{wb})} \quad (110-2)$$

where:

- C_s = Concentration of benzene in the sample, ppm.
- C_c = Concentration of benzene indicated by the gas chromatograph, ppm.
- P_r = Reference pressure, the barometric pressure recorded during calibration, mmHg.
- T_i = Sample loop temperature at the time of analysis, °K.
- P_i = Barometric pressure at time of analysis, mmHg.
- T_r = Reference temperature, the sample loop temperature recorded during calibration, °K.
- S_{wb} = Water vapor content of the bag sample, volume fraction.

9. References

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6. Knoll, Joseph E. Communications Concerning Gas Chromatographic Columns for Separating Benzene From Other Organics in Cumene and Maleic Anhydride Process Effluents. November 10, 1977.

Appendix C**Supplement A—Determination of Adequate Chromatographic Peak Resolution**

In this method of dealing with resolution, the extent to which one chromatographic peak overlaps another is determined.

For convenience, consider the range of the elution curve of each compound as running from -2σ to $+2\sigma$. This range is used in other resolution criteria, and it contains 95.45 percent of the area of a normal curve. If two peaks are separated by a known distance, b , one can determine the fraction of the area of one curve that lies within the range of the other. The extent to which the elution curve of a contaminant compound overlaps the curve of a compound that is under analysis is found by integrating the contaminant curve over limits $b-2\sigma$, to $b+2\sigma$, where σ , is the standard deviation of the sample curve.

There are several ways this calculation can be simplified. Overlap can be determined for curves of unit area; then actual areas can be introduced. The desired integration can be resolved into two integrals of the normal distribution function for which there are convenient calculation programs and tables. An example would be Program 15 in Texas Instruments Program Manual ST1, 1975. Texas Instruments, Inc., Dallas, Texas 75222.

$$\frac{1}{\sqrt{2\pi}\sigma_c} \int_{b-2\sigma_s}^{b+2\sigma_s} e^{-\frac{t_c^2}{2\sigma_s^2}} dt = \frac{1}{\sqrt{2\pi}} \int_{\frac{b-2\sigma_s}{\sigma_c}}^{\frac{b+2\sigma_s}{\sigma_c}} e^{-\frac{x^2}{2}} dx = \frac{1}{\sqrt{2\pi}} \int_{\frac{b-2\sigma_s}{\sigma_c}}^{\frac{b+2\sigma_s}{\sigma_c}} e^{-\frac{x^2}{2}} dx.$$

The following calculation steps are required:*

1. $2\sigma_s = t_s/\sqrt{2 \ln 2}$
2. $\sigma_c = t_c/2\sqrt{2 \ln 2}$
3. $x_1 = (b-2\sigma_s)/\sigma_c$
4. $x_2 = (b+2\sigma_s)/\sigma_c$
5. $Q(x_1) = \frac{1}{\sqrt{2\pi}} \int_{x_1}^{\infty} e^{-\frac{x^2}{2}} dx$
6. $Q(x_2) = \frac{1}{\sqrt{2\pi}} \int_{x_2}^{\infty} e^{-\frac{x^2}{2}} dx$
7. $I_o = Q(x_1) - Q(x_2)$
8. $A_o = I_o A_c / A_s$
9. Percentage overlap = $A_o \times 100$

where

- A_s = The area of the sample peak of interest determined by electronic integration, or by the formula $A_s = h_s t_s$.
- A_c = The area of the contaminant peak, determined in the same manner as A_s .
- b = The distance on the chromatographic chart that separates the maxima of the two peaks.
- H_s = The peak height of the sample compound of interest, measured from the average value of the baseline to the maximum of the curve.
- t_s = The width of the sample peak of interest at 1/2 of peak height.
- t_c = The width of the contaminant peak at 1/2 of peak height.
- σ_s = The standard deviation of the sample compound of interest elution curve.
- σ_c = The standard deviation of the contaminant elution curve.
- $Q(x_1)$ = The integral of the normal distribution function from x_1 to infinity.
- $Q(x_2)$ = The integral of the normal distribution function from x_2 to infinity.
- I_o = The overlap integral.
- A_o = The area overlap fraction.

*In most instances, $Q(x_2)$ is very small and may be neglected.

In judging the suitability of alternate gas chromatographic columns, or the effects of altering chromatographic conditions, one can employ the area overlap as the resolution parameter with a specific maximum permissible value.

The use of Gaussian functions to describe chromatographic elution curves is widespread. However, some elution curves are highly asymmetric. In those cases where the sample peak is followed by a contaminant that has a leading edge that rises sharply but the curve then tails off, it may be possible to define an effective width for t_c as "twice the distance from the leading edge to a perpendicular line through the maximum of the contaminant curve, measured along a perpendicular bisection of that line."

Supplement B—Procedure for Field Auditing GC Analysis

Responsibilities of audit supervisor and analyst at the source sampling site include the following:

A. Check that audit cylinders are stored in a safe location both before and after the audit to prevent vandalism of same.

B. At the beginning and conclusion of the audit, record each cylinder number and cylinder pressure. Never analyze an audit cylinder when the pressure drops below 200 psi.

C. During the audit, the analyst is to perform a minimum of two consecutive analyses of each audit cylinder gas. The audit must be conducted to coincide with the analysis of source test samples. Normally, it will be conducted immediately after the GC calibration and prior to the sample analyses.

D. At the end of audit analyses, the audit supervisor requests the calculated concentrations from the analyst and then compares the results with the actual audit concentrations. If each measured concentration agrees with the respective actual concentration within ± 10 percent, he then directs the analyst to begin the analysis of source samples. Audit supervisor judgment and/or supervisory policy determine course of action with agreement is not within ± 10 percent. Where a consistent bias in excess of 10 percent is found, it may be possible to proceed with the sample analyses, with a corrective factor to be applied to the results at a later time. However, every attempt should be made to locate the cause of the discrepancy, as it may be misleading. The audit supervisor is to record each cylinder number, cylinder pressure (at the end of the audit), and all calculated concentrations. The individual being audited must not under any circumstance be told the actual audit concentrations until the calculated concentrations have been submitted to the audit supervisor.

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