

MONITORING OF EMISSIONS FROM THE PAINT & LACQUER PRODUCTION PROCESS

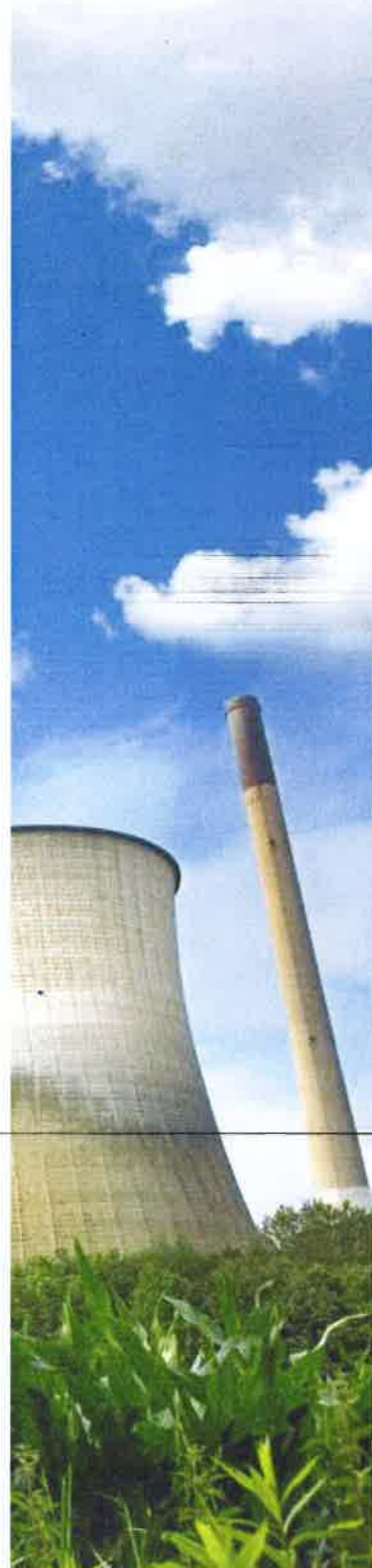
2 September, 2013 (QUARTER 3)

Prepared for Valspar Corporation (UK) Ltd

REC Report 33368p3r0

Issued: 30 September, 2013

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Analyses identified as UKAS accredited were conducted by REC or approved sub-contractors in accordance with their SOPs

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CONTENTS	Page No.
EXECUTIVE SUMMARY	4
1. INTRODUCTION	6
1.1 Background	6
1.2 Scope of the Survey	6
1.3 Sampling Personnel	6
2. METHODOLOGY	7
2.1 Species and Techniques	7
2.2 Sampling & Analytical Methodology	7
2.3 Laboratory Analysis	8
3. SAMPLING AND OPERATIONAL DETAILS	9
3.1 Process Description	9
3.2 Sampling Positions	9
3.3 Uncertainty	9
3.4 Emission Monitoring Survey Details	10
4. RESULTS AND DISCUSSION	11
4.1 Initial Velocity and Temperature Traverse	11
4.2 Particulate Matter	11
4.3 Total VOC Emission Data	11
4.4 Target VOC Emission Data	11

TABLES (2 x Additional Pages)

1	Flow Data
2	Particulate Emission Data
3	VOC Emission Data

APPENDICES

1	Certificate of Analysis (2 x Additional Pages)
2	Diagrams of Sampling Points (5 x Additional Pages)
3	Calculations (1 x Additional Page)

EXECUTIVE SUMMARY

Resource & Environmental Consultants (REC) Ltd was commissioned by Valspar Corporation (UK) Ltd to monitor emissions of pollutants from various stages of their paint and lacquer production processes at their site in Deeside.

In accordance with the requirements of their site permit, monitoring has been undertaken for the following pollutants:-

- Total Volatile Organic Compounds (VOCs) expressed as carbon (C)
- Speciated VOCs, in particular the Class A compounds Ethyl Acrylate and Methyl Acrylate
- Total Particulate Matter

The results of the monitoring survey are summarised in the tables below. Mass emission rates have also been calculated based upon the emission concentration data and measured flowrates. Mass emission rates have been calculated in gram per hour (g/hr) for the Class A VOCs and in kilogram per hour (kg/hr) for the Class B total VOCs.

The following results were obtained from the emission monitoring survey and are compared with the current permit limit:-

PAINT PLANT VOC EMISSIONS

Species	UKAS Status	Average Emission Concentration (mg/Nm ³)	Mass Emission Rate	Permit Emission Rate Limit
		A5	A5	
Total VOCs (as carbon)	C	8,329	3.57 kg/hr	2.0 kg/hr
Ethyl acrylate	B	<3.8	<1.6 g/hr	100 g/hr
Methyl acrylate	B	<3.8	<1.6 g/hr	100 g/hr

NOTE 1: All data are expressed in mg/Nm³ at 273K, 101.3kPa, without correction for water vapour and oxygen content unless otherwise stated.

NOTE 2: (B) REC Ltd accredited for sampling only, UKAS accredited analysis conducted by SAL Ltd. (C) REC Ltd accredited for sampling, sub-contracted analysis by SAL Ltd not UKAS accredited.

RESIN PLANT VOC EMISSION CONCENTRATIONS

Species	UKAS Status	Average Emission Concentration (mg/Nm ³)		
		A1	A2	A3
Total VOCs (as carbon)	C	0.4	12,703	355
Ethyl acrylate	B	1.1	<3.9	<0.4
Methyl acrylate	B	<0.4	3.2	<0.4

NOTE 1: All data are expressed in mg/Nm³ at 273K, 101.3kPa, without correction for water vapour and oxygen content unless otherwise stated.

NOTE 2: (B) REC Ltd accredited for sampling only, UKAS accredited analysis conducted by SAL Ltd. (C) REC Ltd accredited for sampling, sub-contracted analysis by SAL Ltd not UKAS.

RESIN PLANT VOC MASS EMISSION RATES

Species	UKAS Status	Mass Emission Rate			Permit Emission Rate Limit
		A1	A2	A3	
Total VOCs (as carbon kg/hr)	C	<0.001	8.25	0.123	2.0 kg/hr
Ethyl acrylate (g/hr)	B	0.5	<2.6	<0.1	100 g/hr
Methyl acrylate (g/hr)	B	<0.2	6.9	<0.1	100 g/hr

NOTE 1: All data are expressed in mg/Nm³ at 273K, 101.3kPa, without correction for water vapour and oxygen content unless otherwise stated.

NOTE 2: (B) REC Ltd accredited for sampling only, UKAS accredited analysis conducted by SAL Ltd. (C) REC Ltd accredited for sampling, sub-contracted analysis by SAL Ltd not UKAS.

PARTICULATE EMISSIONS

Species	UKAS Status	Average Emission Concentration (mg/Nm ³)		Permit Limit (mg/Nm ³)
		A2	A6	
Particulate Matter	D	9.2	1.8	20

NOTE 1: All data are expressed in mg/Nm³ at 273K, 101.3kPa, without correction for water vapour and oxygen content unless otherwise stated.

NOTE 2: (D) REC Ltd not accredited for sampling, UKAS accredited analysis conducted by SAL Ltd.

1. INTRODUCTION

1.1 Background

Valspar Corporation (UK) Ltd commissioned REC Ltd to conduct an emission monitoring survey on their paint and lacquer production processes, at their site in Deeside.

Although the site is covered by a Part (A1) permit issued by the EA the intrinsic safety issues at the site present significant issues in undertaking the work to the MCERTS standard. In agreement with the Agency the methodology utilised for this work ensures safety requirements at the site are met, albeit using methodology not covered or approved in EA TGN M2.

Due to the IS issues at the site the use of FID monitoring equipment to BS EN 12619 is not possible and adsorption tube sampling therefore undertaken. Sampling for particulate matter cannot be undertaken in accordance with BS EN 13284 again due to the IS issues at the site.

This sampling methodology does not comply with EA Technical Guidance Note M2 requirements for sampling total VOCs and therefore MCERTS requirements. Also it is not possible to identify all of the VOCs present prior to sampling as they contain complicated aliphatic and aromatic hydrocarbon mixtures e.g. white spirit and low aromatic white spirit.

1.2 Scope of the Survey

An emission monitoring survey was required to determine the release concentrations of volatile organic compounds (VOCs) and particulate matter released from the paint and lacquer production processes.

Ancillary measurements of stack dimensions, temperature and velocity were also to be made.

All results were to be reported at 273K, 101.3kPa, without correction for water vapour and oxygen content. Emission rates expressed in kilogram per hour (kg/hr) for total VOCs and gram per hour (g/hr) for the target VOCs were also to be calculated.

1.3 Sampling Personnel

Monitoring was conducted by the following REC Ltd permanent staff:-

- Rob Jones - Team Leader, MM08 984, MCERTS Level 2, TE1-4

2. METHODOLOGY

2.1 Species and Techniques

The following table shows the reference methods used for the emission monitoring survey:

Species	Accreditation Status	Method	Uncertainty±%	Limit of Detection
Particulate Matter	D	Based on BS 3405	25	1 mg/m ³
Methyl Acrylate + Ethyl Acrylate	B	In house method MM0011 based on BS EN 13649	30	0.1 mg/m ³
Total VOCs	C	In house method MM0011 based on BS EN 13649	33 to 300	0.1 mg/m ³

NOTE: UKAS Status:- (B) REC Ltd accredited for sampling only, UKAS accredited analysis conducted by SAL Ltd. (C) REC Ltd accredited for sampling, sub-contracted analysis by SAL Ltd not UKAS accredited (D) REC Ltd not accredited for sampling, UKAS accredited analysis conducted by SAL.

2.2 Sampling & Analytical Methodology

The Valspar site is intrinsically safe, making the use of normal particulate sampling equipment which satisfies the requirements of BS EN 13284 and BS ISO 9096 impracticable.

The equipment utilised in the survey satisfied the requirements of BS 3405. This standard describes methodology for measuring particulate matter under defined conditions and at discrete locations in the duct. If all the procedural requirements of the test are complied with, the accuracy of the test results can be quoted as $\pm 25\%$.

REC is not accredited for sampling to this test procedure.

To determine the concentration of particulate matter in emissions, SKC isokinetic stack sampling equipment was utilised. The sampling train consisted of an in stack nozzle/ stainless steel filter holder containing a 37 mm GF filter.

This was connected to an intrinsically safe battery operated sampling pump. Isokinetic sampling was maintained, as far as practicable, by selection of a suitable diameter nozzle to suit the maximum sampling flowrate through the pump (5.0 l/min). The flowrate was checked using a calibrated rotameter.

Total VOCs

To determine the concentration of VOCs in emissions, stack sampling equipment satisfying the requirements of BS EN 13649 was employed. In house method MM0011 was followed.

Sampling was carried out under non-isokinetic sampling conditions. A sample of the exhaust stream was removed from the stack via a probe. The gas is then passed through Charcoal adsorption tubes.

The adsorption tubes are used to absorb the VOCs. The tubes were connected to either low flow (20-200ml/min) sampling pumps or dry gas meters to measure the volume sampled.

Upon completion of sampling the tubes were capped, labelled and placed in a cool box for transport back to the laboratory.

The tubes were chemically desorbed and analysed by a high resolution GC/MS operating in the scanning mode to identify and semi-quantify the compounds of interest. The main VOCs detected are identified against the instruments vast spectral library and concentrations "semi-quantified" against the deuterated toluene internal standard.

This technique is "semi-quantitative" in that the compounds are quantified against an internal standard as opposed to the compounds themselves. This increases the systematic errors and the true result, in 95% of cases, actually lies between a factor of 1/3 and three times the concentration quoted.

No laboratory can be UKAS accredited for this type of semi-quantitative work.

Target VOCs

Sampling for Methyl Acrylate and Ethyl Acrylate (Class A VOCs) was carried out using charcoal adsorption tubes using methodology as per BS EN 13649 (in house method MM0011). The tubes were connected to either low flow sampling pumps fitted with a stroke meter to determine the volume sampled or dry gas meters to measure the volume sampled. The pump stroke rate was determined quarterly against a UKAS calibrated bubble flowmeter.

The tubes were chemically desorbed and analysed by a high resolution GC/MS operating in the target mode to identify and quantify the compounds of interest against prepared standards.

From the mass of each target VOC detected on the tube in microgram ($\mu\text{g}/\text{tube}$) and volume sampled, an emission concentration was calculated.

Stack Temperature and Velocity

Due to the IS restrictions an intrinsically safe thermocouple/reader and pitot/manometer were used in the survey to measure temperature and velocity.

2.3 Laboratory Analysis

An approved UKAS accredited sub-contractor, SAL Ltd, undertook the sample analysis for particulates and total/target VOCs on adsorption tubes.

A copy of their Certificate of Analysis is enclosed in Appendix 1.

3. SAMPLING AND OPERATIONAL DETAILS

3.1 Process Description

The process operations at Valspar Corporation (UK) Ltd are authorised as a Part A(1) process under the Pollution Prevention & Control (PPC) Regulations. They operate in accordance with a permit issued by the Environment Agency, Permit No. BU7545IM.

Valspar are a paint and lacquer manufacturing company. The processes at the site are batch processes with various durations typically ranging from 8 to 24 hours. The following paints/lacquers were being produced during the sampling:

4020W01D BX#20901, 16Q1AC BX#20827, 4800A07R BX#20895, 4000W56R/11HB BX#20906, 11Q28EH BX#20636

Due to intrinsic safety requirements at the site sampling cannot be undertaken in accordance with the requirements of MCERTS and the scope therefore reduced, in agreement with the EA, to methodology some of which does not satisfy the requirements of EA TGN M2.

3.2 Sampling Positions

The Valspar site is intrinsically safe working area which limits the sampling equipment and monitoring techniques that can be utilised. The following summarises the access at each emission point:

A1 - 1 x 1" hole drilled in a vertical section of the stack. The hole is located at best 2 hydraulic diameters downstream and 2 hydraulic diameters upstream of any possible flow disturbance. Access was inside the main building.

A2 - 1 x 2" hole drilled on a circular stack. The hole is located approximately 5 hydraulic diameters downstream and 3 hydraulic diameters upstream of any possible flow disturbance. Access was via a short ladder and located inside the main building.

A3 - 1 x 1" hole drilled in a vertical section of the stack. The hole was located at least 5 hydraulic diameters upstream and downstream of any possible flow disturbance. Access to the stack was via the roof.

A5 - 1 x 2" port on a circular stack. The hole is located approximately 5 hydraulic diameters downstream and 3 hydraulic diameters upstream of any possible flow disturbance. Access was via some steps and located inside the main building.

A6 - 2 x 2" ports on square stack on the same vertical plane above each other. They are located less than 3 hydraulic diameters upstream and downstream of any possible flow disturbance. Access via a small permanent ladder and platform.

Diagrams detailing the sampling positions and taken from Site Worksheets are provided in Appendix 1

3.3 Uncertainty

All standard methods were fully complied with, consequently the standard uncertainties apply.

REC has calculated uncertainty budgets for all of the pollutants listed in the Method Details Table in Section 2.1 above in accordance with calculations and methodology supplied by the Source Testing Association (STA). These uncertainties are quoted in the Tables section of this report.

For total VOCs the peaks are quantified against an internal standard as opposed to the compounds themselves. This increases the systematic errors and the true result, in 95% of cases, actually lies between a factor of 1/3 and three times the concentration quoted.

3.4 Emission Monitoring Survey Details

The emission monitoring survey was carried out on the processes on 4 June, 2013. The table below summarises the actual sampling periods.

SAMPLING PERIODS

Stack	Parameter	Sample Time (& Date)
A1	Total & Target VOCs	11:10 – 12:10 (02/09/13)
A2	Particulates	11:00 – 12:00 (02/09/13)
	Total & Target VOCs	11:00 – 12:00 (02/09/13)
A3	Total & Target VOCs	12:35 – 13:35 (02/09/13)
A5	Total & Target VOCs	12:10 – 13:20 (02/09/13)
A6	Particulates	13:25 – 14:25 (02/09/13)

4. RESULTS AND DISCUSSION

4.1 Initial Velocity and Temperature Traverse

An initial pitot-static pressure and temperature traverse was carried out. From these data stack velocity, expressed in metres per second (m/s), and volumetric flowrates expressed in cubic metre per hour (m³/hr) have been calculated.

The results are reported at actual stack conditions and the volumetric flowrate is further expressed at the standard reference conditions of 273K, 101.3kPa i.e. standard temperature and pressure (STP). The results are summarised in Table 1.

4.2 Particulate Matter

The results of the particulate sampling runs are summarised in Table 2.

From the mass of particulate matter on the filter and volume sampled an emission concentration was calculated.

The results are expressed in mg/m³ at 273K, 101.3kPa, on a wet gas basis without correction for oxygen content.

4.3 Total VOC Emission Data

The results of the total VOC monitoring tests are summarised in Table 3.

From the total mass of all of the peaks detected on the tubes in microgram (µg) and volume sampled in litres an emission concentration was calculated. Concentrations are expressed in mg/m³ at the standard reference conditions of 273K, 101.3kPa without correction for water vapour or oxygen content.

Mass emission rates of total Class B VOCs expressed in kilogram per hour (kg/hr) have also been calculated from the emission data and volume flows from Table 1.

The sample from A5 was found to have >5% detected on the back up section of the adsorption tube, which is a deviation from BS EN 13649 requirements.

4.4 Target VOC Emission Data

The results of the target VOC monitoring tests for Methyl acrylate and Ethyl acrylate are summarised in Table 3. Mass emission rates of these Class A VOCs, expressed in gram per hour (g/hr) have also been calculated from the emission data and volume flows from Table 1.

From the mass of the target VOCs on the tubes in microgram (µg) and volume sampled in litres an emission concentration was calculated. Concentrations are expressed in mg/m³ at the standard reference conditions of 273K, 101.3kPa without correction for water vapour or oxygen content. The sample from A3 for methyl acrylate was found to have >5% detected on the back up section of the adsorption tube, which is a deviation from BS EN 13649 requirements.

===== End of Report Text =====

TABLES

TABLE 1**FLOW DATA**

Stack Ref.	Stack Temp	Av Pitot ΔP	X-Sect. Area	Velocity (actual)	Volume Flow (m ³ /hr)	
	(°C)	(Pa)	(m ²)	(m/s)	(actual)	(@ ntp)
A1	13	10	0.031	4.1	452	429
A2	15	23	0.031	6.2	697	650
A3	15	172	0.006	16.9	365	347
A5	16	18	0.023	5.5	452	429
A6	22	15	0.168	5.0	3,019	2,863

TABLE 2**PARTICULATE EMISSION DATA**

Sampling Data	A2	A6
Start Time/Date	11:00, 02/09/13	13:25, 02/09/13
End Time/Date	12:00, 02/09/13	14:25, 02/09/13
Sampling Period (min)	60	60
Volume Sampled (dry m ³)	0.170	0.390
Ambient Temp (°C)	21	21
Ambient Press (kPa)	101.3	101.2
Volume Sampled, 273K, 101.3kPa (m ³)	0.158	0.362
Analytical Data		
Wt gain filter (mg)	1.45	0.65
Total particulate matter (mg)	1.45	0.65
Emission Concentration Data		
Particulates (mg/m ³)	9.2	1.8

TABLE 3
VOC EMISSION DATA

Sampling Data	A1	A2	A3	A5
DGM Ref (AQ No.)		202		202
Start Time	11:10	11:00	12:35	12:10
End Time	12:10	12:00	13:35	13:10
Stroke or DGM Start	4083688	5194	408717	9353
Stroke or DGM End	4083716	9347	408744	13667
Stroke Cal Factor		0.66		0.66
Volume Sampled (litres)	27.80	2.74	27.00	2.85
Ambient Temp (°C)	21	21	21	21
Ambient Press (kPa)	101.2	101.2	101.2	101.2
Volume Sampled, 273K, 101.3kPa (litres)	25.789	2.543	25.047	2.641
Analytical Data				
Ethyl Acrylate on tube front section (µg)	23	<5	<5	<5
Ethyl Acrylate on tube rear section (µg)	<5	<5	<5	<5
Mass on Back-up Section (%)	<17.9	<50.0	<50.0	<50.0
Methyl Acrylate on tube front section (µg)	<5	18	<5	<5
Methyl Acrylate on tube rear section (µg)	<5	9	<5	<5
Mass on Back-up Section (%)	<50.0	33.3	<50.0	<50.0
Total VOCs on tube front section (µg)	9	27,000	8,900	22,000
Total VOCs on tube rear section (µg)	<1	5,300	1	1
Mass on Back-up Section (%)	<10.0	16.4	<0.1	<0.1
Emission Concentration Data				
Ethyl Acrylate (mg/m ³)	1.1	3.9	0.4	3.8
Uncertainty (± mg/m ³)	0.3	1.2	0.1	1.1
Methyl Acrylate (mg/m ³)	0.4	10.6	0.4	3.8
Uncertainty (± mg/m ³)	0.1	3.2	0.1	1.1
Total VOCs(mg/m ³)	0.4	12703.1	355.4	8329.7
Uncertainty (± mg/m ³)	0.1 1.2	3810 38109	106.6 1066	2498 24989
Volume Flowrate (m ³ /hr)	429	650	347	429
Ethyl Acrylate (g/hr)	0.5	2.6	0.1	1.6
Methyl Acrylate (g/hr)	0.2	6.9	0.1	1.6
Total VOCs (kg/hr)	<0.001	8.254	0.123	3.572

APPENDIX 1

Certificate of Analysis



Scientific Analysis Laboratories is a
limited company registered in England and
Wales (No 2514788) whose address is at
Hadfield House, Hadfield Street, Manchester M16 9FE

Scientific Analysis Laboratories Ltd

Certificate of Analysis

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Report Number: 348552-1

Date of Report: 16-Sep-2013

Customer: Resource Environmental Consultants Ltd
Osprey House
Pacific Quay
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Salford
M50 2UE

Customer Contact: Mr Robert Jones

Customer Job Reference: 33368

Customer Site Reference: Date Collected: 2/9/13

Date Job Received at SAL: 04-Sep-2013

Date Analysis Started: 09-Sep-2013

Date Analysis Completed: 16-Sep-2013

The results reported relate to samples received in the laboratory
Opinions and interpretations expressed herein are outside the scope of UKAS accreditation
This report should not be reproduced except in full without the written approval of the laboratory
Tests covered by this certificate were conducted in accordance with SAL SOPs
All results have been reviewed in accordance with QP22



Report checked
and authorised by :
James Allan
Project Manager

Issued by :
Kayleigh McCann
Project Manager

Signature valid

Digitally signed by Kayleigh
McCann
Date: 2013.09.16 07:42 BST
Reason: Issue
Location: SAL

SAL Reference: 348552							
Project Site: Date Collected: 2/9/13							
Customer Reference: 33368							
Filter Quartz 37mm Analysed as Filter Quartz 37mm							
Miscellaneous							
SAL Reference		348552 009	348552 011	348552 013			
Customer Sample Reference		33368/9	33368/11	33368/13			
Test Sample		AR	AR	AR			
Filter Reference		159	177	192			
Determinand	Method	LOD	Units	Symbol			
Particulates (Total)	Grav (6 Dec)	0.05	mg	U	<0.05	<0.05	<0.05

SAL Reference: 348552							
Project Site: Date Collected: 2/9/13							
Customer Reference: 33368							
Wash(Acetone) Analysed as Wash(Acetone)							
Miscellaneous							
SAL Reference		348552 010	348552 012	348552 014			
Customer Sample Reference		33368/10	33368/12	33368/14			
Test Sample		AR	AR	AR			
Determinand	Method	LOD	Units	Symbol			
Particulates (Total)	Grav	0.3	mg	U	1.4	0.6	0.6

SAL Reference: 348552										
Project Site: Date Collected: 2/9/13										
Customer Reference: 33368										
Tube (Charcoal 226-09) Analysed as Tube (Charcoal 226-09)										
Suite A										
SAL Reference					348552 001	348552 002	348552 003	348552 004	348552 005	
Customer Sample Reference					33368/1	33368/2	33368/3	33368/4	33368/5	
Test Sample					AR	AR	AR	AR	AR	
Determinand	Method	LOD	Units	Symbol						
Ethyl acrylate	GC/MS	5	µg	U	23	<5	<5	<5	<5	
Methyl acrylate	GC/MS	5	µg	U	<5	<5	(37) 18	9	<5	
VOC (Total excluding targets)	GC/MS	1	µg	N	9	<1	(37) 27000	5300	8900	

SAL Reference: 348552									
Project Site: Date Collected: 2/9/13									
Customer Reference: 33368									
Tube (Charcoal 226-09) Analysed as Tube (Charcoal 226-09)									
Suite A									
SAL Reference					348552 006	348552 007	348552 008	348552 015	
Customer Sample Reference					33368/6	33368/7	33368/8	33368/15	
Test Sample					AR	AR	AR	AR	
Determinand	Method	LOD	Units	Symbol					
Ethyl acrylate	GC/MS	5	µg	U	<5	<5	<5	<5	
Methyl acrylate	GC/MS	5	µg	U	<5	<5	<5	<5	
VOC (Total excluding targets)	GC/MS	1	µg	N	<1	3	(37) 22000	<1	

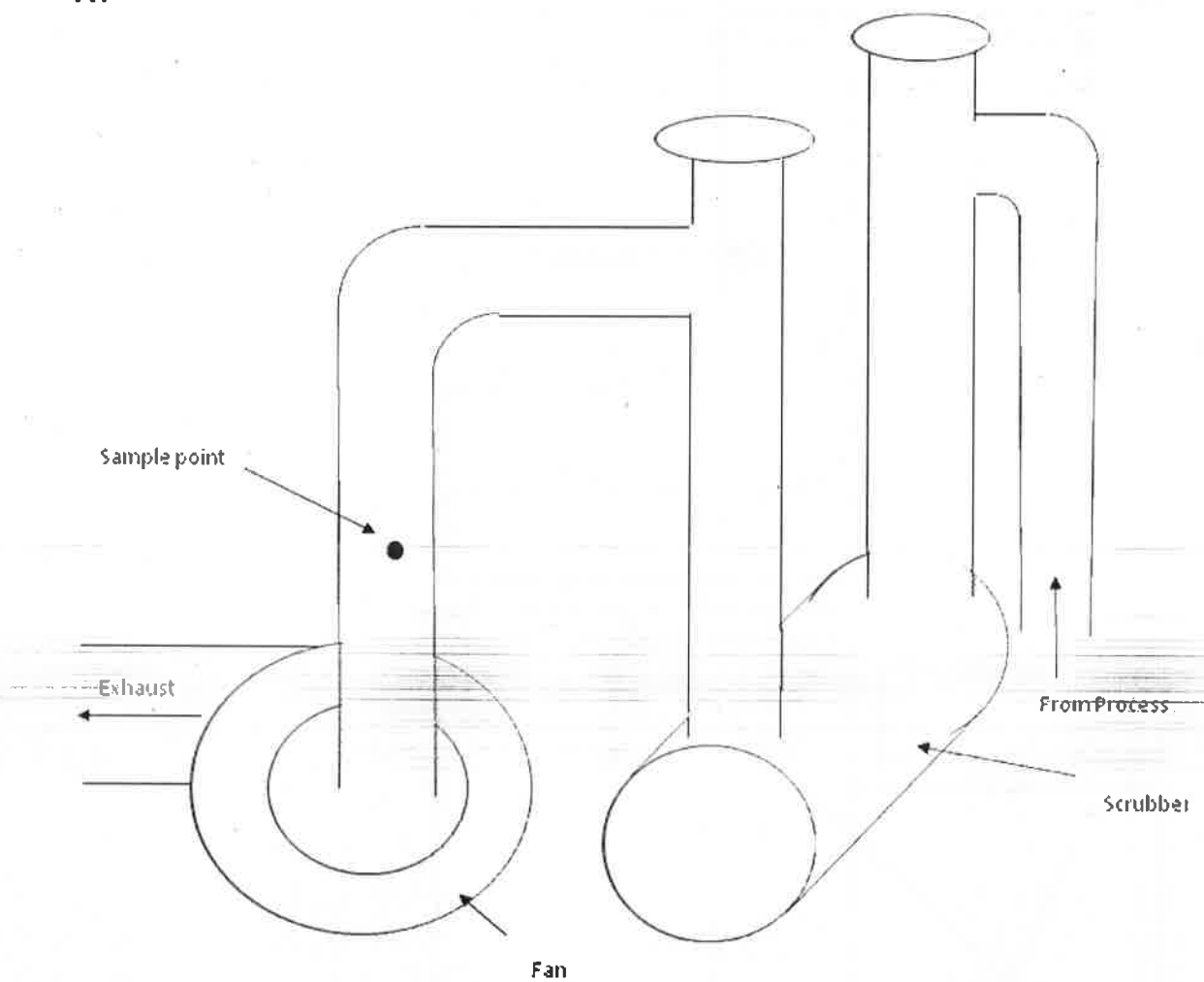
Index to symbols used in 348552-1

Value	Description
AR	As Received
37	There was >10% found on the back section of the tube
U	Analysis is UKAS accredited
N	Analysis is not UKAS accredited

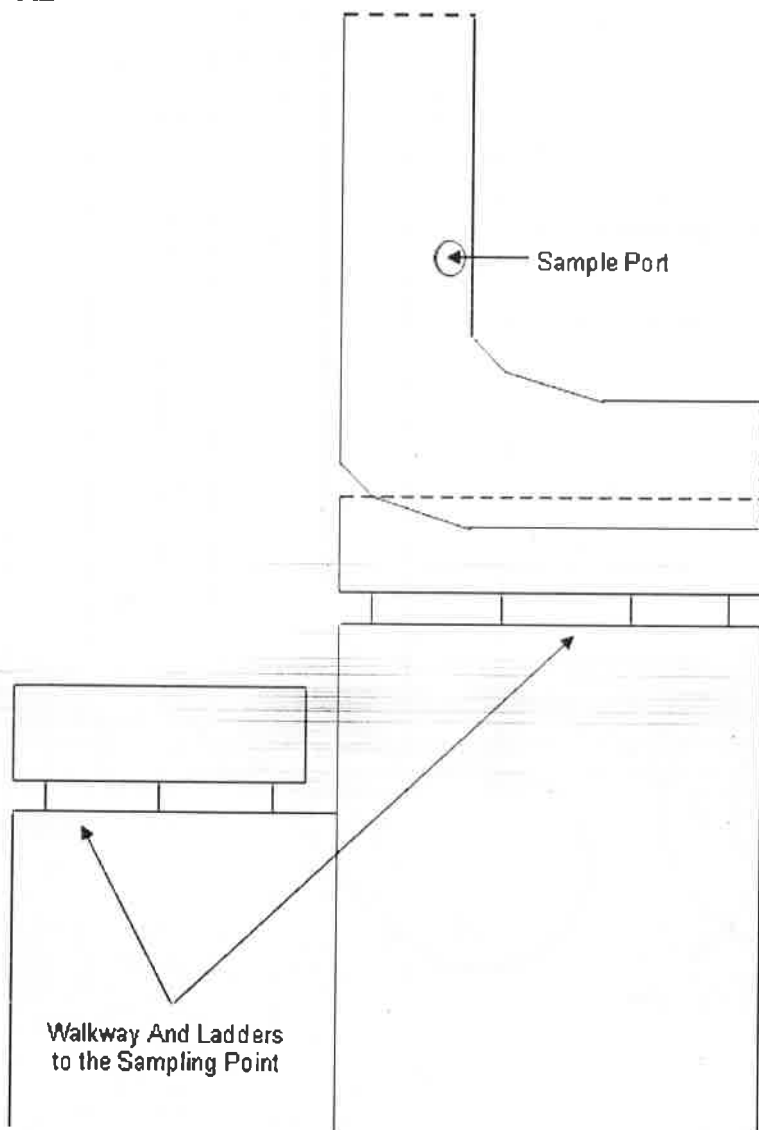
APPENDIX 2

Diagrams of Sampling Points

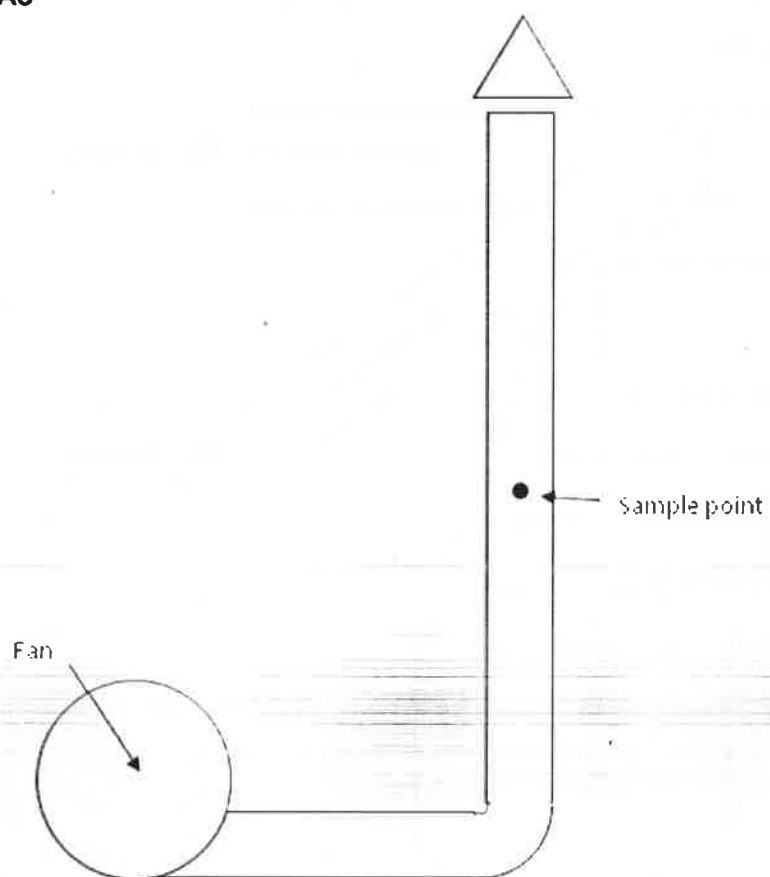
A1



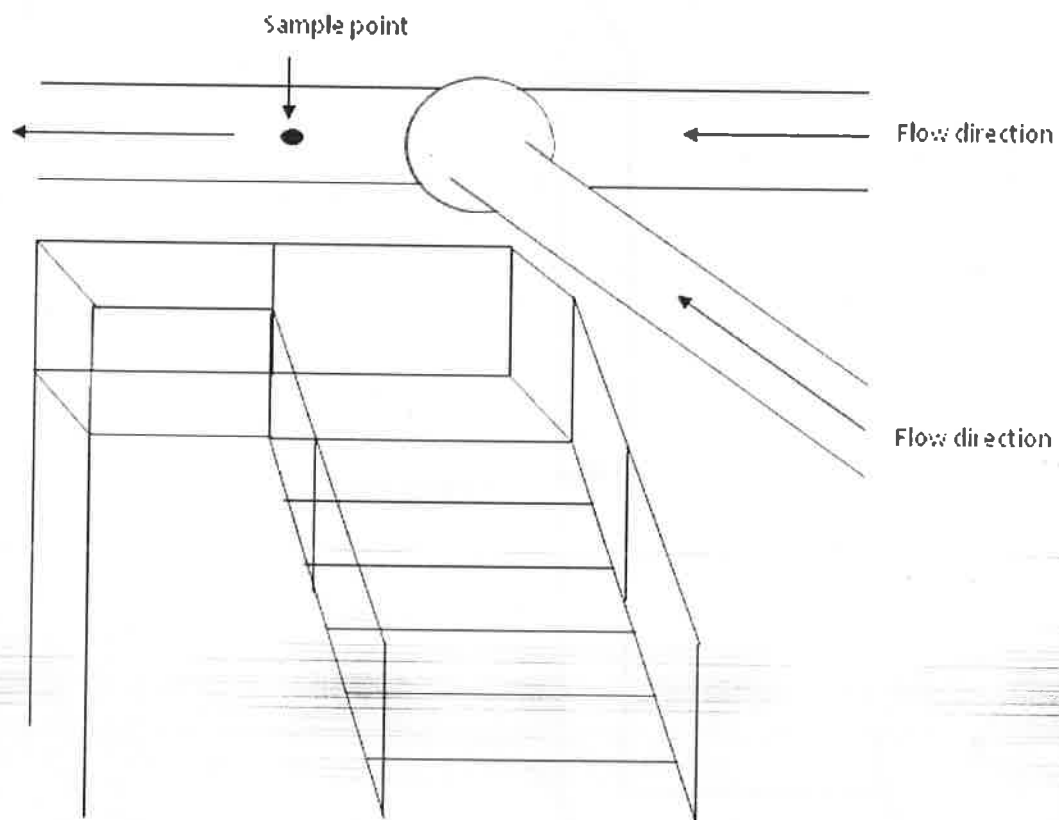
A2



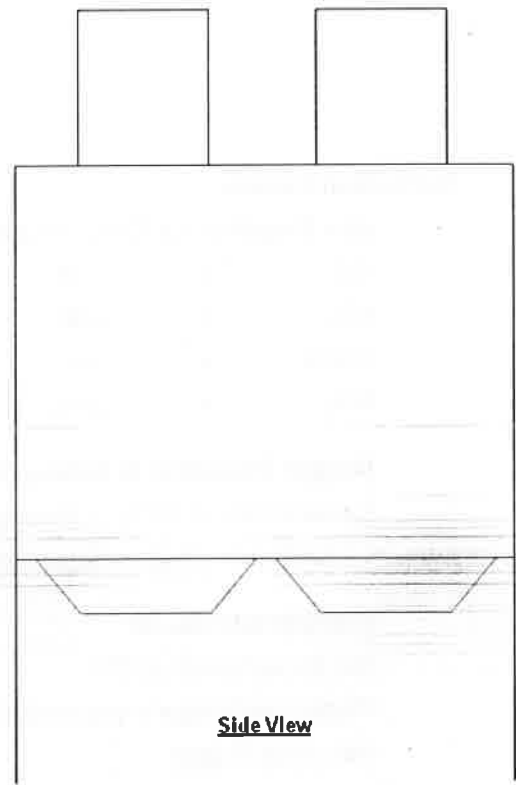
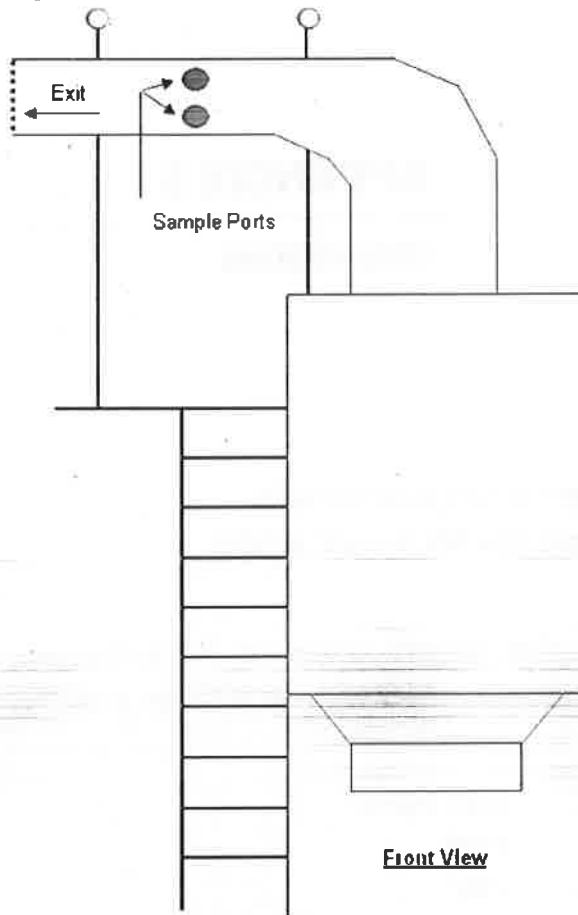
A3



A5



A6



APPENDIX 3

Calculations

Conversion Factors

ppm @ mg/Nm³ (at 273K, 101.3kPa: STP)

CO	x	1.25	
SO ₂	x	2.86	
VOC's	x	1.61	(ppm as C ₃ H ₈ to mg/Nm ³ as C)
NO _x	x	2.05	(ppm NO + NO ₂ to mg/m ³ as NO ₂)

Oxygen Correction to Reference Value

Concentration at (STP) -> Concentration at 273K, 101.3kPa, reference O₂ and Dry Gas, i.e.

Concentration X ((20.9-O₂ ref)/(20.9-O₂ measured)) = Concentration at ref Oxygen state.

Example Calculation

SO ₂ concentration at STP	=	170.7 mg/Nm ³
Oxygen percentage in gas stream	=	13.8%
Reference Oxygen	=	11%
SO ₂ concentration at reference O ₂ conditions	=	170.7 ((20.9-11)/(20.9-13.8))
	=	238 mg/Nm ³ at 273K, 101.3kPa, 11% O ₂ and Dry Gas

Moisture Correction (Wet to Dry)

Concentration of Gas Dry = Concentration of x 100/100-Bws Gas Wet

Concentration of Gas Wet = Concentration of x 100-Bws/100 Gas Dry

Where Bws = moisture content of gas stream in percent (Vol/Vol).

Example

VOC concentration	=	25 mg/Nm ³ (Wet)
Moisture Content	=	27.1%
Concentration of VOC	=	25 (100/(100-27.1))

Carbon (C) to Trichloethylene (TCE)

ppm TCE = ppm C x 0.6715

TCE in mg/m³ = TCE ppm x 5.864 (Mol Wt/22.4)