

US EPA ARCHIVE DOCUMENT

	B	C
1	<b>Source Description</b>	
2		
3	Phase II ID No.	2020
4	EPA ID No.	TXD008092793
5	Facility Name	Dow Chemical Company
6	Facility Location	
7	City	Freeport
8	State	TX
9	Unit ID Name/No.	F-2820
10	Other Sister Facilities	None
11	Number of Sister Facilities	0
12	Combustor Class	HCl Production Furnace
13	Combustor Type	
	Combustor Characteristics	Firetube boiler, Johnston Boiler Company, horizontal fired combustion chamber, T-Thermal, capacity of 40 MMBtu/hr, operated @ 1530C, soot blowing used
14		
15	Capacity (MMBtu/hr)	40
16	Soot Blowing	Yes
17	APCS Detailed Acronym	WHB/VS/WS
18	APCS General Class	WHB, HEWS, LEWS
19	APCS Characteristics	Venturi scrubber, acid scrubber (T-2820) uses caustic
20	Hazardous Wastes	Liq
21	Haz Waste Description	Liquid wastes (TDI Tars)
22	Supplemental Fuel	Natural gas
23		
24	Stack Characteristics	
25	Diameter (ft)	2
26	Height (ft)	186
27	Gas Velocity (ft/sec)	43.8
28	Gas Temperature (°F)	
29		
30	Permitting Status	Tier I for all metals (except Tier III for Cr+6)
	HWC Burn Status (Date if	
31	Terminated)	

	B	C
1	<b>Cond Description</b>	
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3	<b>2020C1</b>	
4		
5	Report Name/Date	F-2820 Trial Burn Report, May 6, 1999
6	Report Prepare	Focus Environmental, Inc.
7	Testing Firm	METCO Environmental
8	Testing Dates	February 12 and March 2, 1999
9	Cond Dates	Feb-99
10	Condition Descr	Trial burn, max waste feed, max op temp and prod rate, min APCS dP
11	Content	PM, HCl/Cl <sub>2</sub> , Cr+6 (run 3 reported as run 5), CO (report only run 1, 2, and 5)
12	<b>2020C2</b>	
13		
14	Report Name/Date	F-2820 Trial Burn Report, May 6, 1999
15	Report Prepare	Focus Environmental, Inc.
16	Testing Firm	METCO Environmental
17	Testing Dates	February 11, 1999
18	Cond Dates	Feb-99
19	Condition Descr	Trial burn, min comb temp and max comb gas flow.
20	Content	DRE for POHC (ODCB), CO
21		
22	<b>2020C3</b>	
23		
24	Report Name/Date	Risk Rurn Report for Dow Facility ID No. F-2820, June 16, 2000
25	Report Prepare	Focus Environmental, Inc.
26	Testing Firm	METCO Environmental
27	Testing Dates	March 21-22, 2000
28	Cond Dates	Mar-00
29	Condition Descr	Risk burn, normal operating cond of liq feed and comb temp
30	Content	PCDD/PCDF, metals

	B	C	D	E	F	G	H	I	J	K	L	M
1	<b>Stack Gas Emissions</b>											
2												
3		Comments	Units	7% O2								
4												
5												
6	<b>2020C1</b>	<b>Trial burn</b>				R1		R2		R3		Cond Avg
7												
8	PM	E1	gr/dscf	y		0.0093		0.0082		0.0079		0.0085
9	CO (MHRA)	E1	ppmv	y		4.2		5.3		6.1		5.2
10	CO (RA)	E1	ppmv	y		2.84		4.65		3.5		3.6
11	HCl		g/hr		nd	10.5		14.3	nd	11.4		12.1
12	Cl2		g/hr		nd	2.47	nd	2.34		3.03		2.61
13	Chromium (Hex)		g/hr			0.033		0.029		0.019		0.027
14												
15	Chromium (Hex)	E2	µg/dscm	y		2.0		1.7		1.0		1.5
16												
17	HCl	E1	ppmv	y	nd	0.4		0.6	nd	0.4	59	0.5
18	Cl2	E1	ppmv	y	nd	0.1	nd	0.0		0.1	65	0.1
19	Total Chlorine	E1	ppmv	y	100	0.5	14	0.7	79	0.5	60	0.6
20												
21	Sampling Train	PM, HCl/Cl2	E1									
22	Stack Gas Flowrate		dscfm			7925		8195		8627		8249.0
23	O2		%			3.7		4		2.3		3.3
24	Moisture		%									
25	Temperature		°F									
26												
27	Sampling Train	Cr+6	E2									
28	Stack Gas Flowrate		dscfm			7925		8195		8627		8249
29	O2		%									
30	Moisture		%									
31	Temperature		°F									
32												
33	<b>2020C2</b>	<b>Trial burn</b>				R1		R2		R3		Cond Avg
34												
35	CO (MHRA)	E1	ppmv	y		6.4		6.3		7.5		6.7
36	CO (RA)	E1	ppmv	y		5.71		5.94		6.17		5.9
37												
38	ODCB											
39	POHC Feedrate		lb/hr			20		20		20		
40	Emission Rate	E1	lb/hr		nd	1.57E-06	nd	1.05E-06	nd	3.20E-06		
41	DRE	E1	%		>	99.999214		99.99995	>	99.999984		
42												
43	Sampling Train	DRE	E1									
44	Stack Gas Flowrate		dscfm			10745		11197		11097		11013
45	O2		%									
46	Moisture		%									
47	Temperature		°F									
48												
49	<b>2020C3</b>	<b>Risk burn</b>				R1		R2		R3		Cond Avg
50												
51	CO (MHRA)	E1	ppmv	y		4.67		2.2		2.47		3.11
52	Antimony		g/hr		nd	0.0038	nd	0.0037	nd	0.008	nd	0.01
53	Arsenic		g/hr		nd	0.0029	nd	0.0028	nd	0.0028	nd	0.00
54	Barium		g/hr			0.00173		0.00628		0.0388		0.02
55	Beryllium		g/hr		nd	0.00016	nd	0.00017	nd	0.00014	nd	0.00
56	Cadmium		g/hr		nd	0.0029	nd	0.003	nd	0.00714	nd	0.00
57	Chromium		g/hr			0.534		0.579		0.495		0.54
58	Cobalt		g/hr		nd	0.24	nd	0.25	nd	0.23	nd	0.24
59	Copper		g/hr			0.172		0.0757		0.101		0.12
60	Lead		g/hr			0.0232		0.0194		0.0193		0.02
61	Manganese		g/hr			0		1.43		0.883		0.77
62	Mercury		g/hr		nd	0.0013	nd	0.0015	nd	0.0014	nd	0.00
63	Molybdenum		g/hr		nd	0.16	nd	0.15	nd	0.161	nd	0.16
64	Nickel		g/hr			15.7	nd	17		14.3		15.67
65	Selenium		g/hr		nd	0.0025	nd	0.0037	nd	0.0025	nd	0.00
66	Silver		g/hr		nd	0.0017	nd	0.0017	nd	0.0017	nd	0.00
67	Thallium		g/hr		nd	0.014	nd	0.011	nd	0.015	nd	0.01
68	Vanadium		g/hr		nd	0.012	nd	0.0082	nd	0.0054		0.01
69												
70	Sampling Train	Metals	E1									
71	Stack Gas Flowrate		dscfm			8646		8274		8180		8367

	B	C	D	E	F	G	H	I	J	K	L	M
72	O2		%									
73	Moisture		%									
74	Temperature		°F									
75												
76	Sampling Train	PCDD/PCDF	E2									
77	Stack Gas Flowrate		dscfm			8215		8628		8318		8387
78	O2		%			2.8		2.9		2.9		2.87
79	Moisture		%									
80	Temperature		°F									
81												
82	Antimony	E1	ug/dscm	y	nd	0.20	nd	0.20	nd	0.45	100	0.14
83	Arsenic	E1	ug/dscm	y	nd	0.15	nd	0.15	nd	0.16	100	0.15
84	Barium	E1	ug/dscm	y		0.09		0.35		2.16		0.87
85	Beryllium	E1	ug/dscm	y	nd	0.01	nd	0.01	nd	0.01	100	0.01
86	Cadmium	E1	ug/dscm	y	nd	0.15	nd	0.17	nd	0.40	100	0.24
87	Chromium	E1	ug/dscm	y		27.98		31.88		27.57		29.14
88	Cobalt	E1	ug/dscm	y	nd	12.58	nd	13.76	nd	12.81	100	6.52
89	Copper	E1	ug/dscm	y		9.01		4.17		5.62		6.27
90	Lead	E1	ug/dscm	y		1.22		1.07		1.07		1.12
91	Manganese	E1	ug/dscm	y		0.00		78.73		49.17		42.63
92	Mercury	E1	ug/dscm	y	nd	0.07	nd	0.08	nd	0.08	100	0.08
93	Molybdenum	E1	ug/dscm	y	nd	8.38	nd	8.26	nd	8.97	100	4.27
94	Nickel	E1	ug/dscm	y		822.63	nd	935.93		796.33		851.63
95	Selenium	E1	ug/dscm	y	nd	0.13	nd	0.20	nd	0.14	100	0.08
96	Silver	E1	ug/dscm	y	nd	0.09	nd	0.09	nd	0.09	100	0.05
97	Thallium	E1	ug/dscm	y	nd	0.73	nd	0.61	nd	0.84	100	0.36
98	Vanadium	E1	ug/dscm	y		0.63		0.45		0.30		0.46
99	SVM	E1	ug/dscm	y	11	1.37	13	1.23	27	1.47	18	1.36
100	LVM	E1	ug/dscm	y	1	28.1	1	32.0	1	27.7	1	29.30
101												
102	<b>Particle Size Distribution</b>											
103	0.2-0.5	wt %				0.34						
104	0.5-0.9	wt %				0.43						
105	0.9-1.3	wt %				0.41						
106	1.3-2.7	wt %				52.09						
107	2.7-4.5	wt %				24.87						
108	4.5-6.5	wt %				20.83						
109	6.5-9.7	wt %				0.34						
110	9.7-15	wt %				0.34						
111	> 15	wt %				0.34						

	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y
1	<b>Feedstreams</b>																							
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61	Feedstream Description																						
62	Feed Rate	lb/hr		2000	2000	2000	1999	1999.5															
63	Thermal Feedrate	MMBtu/hr		22.4	22.3	22.3	22.2	22.3															
64	Viscosity	cps		334	176.5	176.5	96	202,167															
65	Heating Value	Btu/lb		11210	11130	11130	11100	11146.7															
66	Density	lb/gal		10.7	10.6	10.6	10.5	10.6															
67	Ash	lb/hr		1.2	1.1	1.1	1	1.1															
68	Chlorine	lb/hr		50.6	52.2	52.2	50.8	51.2															
69	Stack Gas Flowrate	dscfm		10745	11197	11197	11097	11013															
70	Oxygen	%		3.7	4	4	2.3	3.3															
71																							
72	Estimated Firing Rate	MMBtu/hr										59.0	60.4	65.9	65.9	61.8							
73																							
74																							
75	Feedrate MTEC Calculations																						
76	Ash	mg/dscm		24.2	21.6	21.6	18.0	21.2															
77	Chlorine	ug/dscm		1018929.6	1026516.9	1026516.9	916352.8	985044.6															
78																							
79	<b>2020C3</b>																						
80																							
81	Feedstream Number																						
82	Feed Class																						
83	Feed Class 2																						
84	Feedstream Description																						
85	Feed Rate	lb/hr		3411	3250	3250	3225	3294.0															
86	Thermal Feedrate	MMBtu/hr		38.7	37.1	37.1	36.5	37.4															
87	Heating Value	Btu/lb		11400	11400	11400	11300	11367															
88	Ash	lb/hr		0.287	0.309	0.309	0.306	0.30															
89	Chlorine	lb/hr		13	12	12	11.6	12.2															
90	Antimony	g/hr		0.39 nd	0.37 nd	0.37 nd	0.37	0.38															
91	Arsenic	g/hr		0.062 nd	0.059 nd	0.059 nd	0.059	0.6															
92	Barium	g/hr		0.121	0.13	0.13	0.123	0.1															
93	Beryllium	g/hr		0.0387	0.0384	0.0384	0.0366	0.038															
94	Cadmium	g/hr		0.031	0.0339	0.0339	0.063	0.042															
95	Chromium	g/hr		2.14	2.11	2.11	1.8	2.0															
96	Lead	g/hr		0.4 nd	0.38 nd	0.38 nd	0.504	0.4															
97	Mercury	g/hr		0.12 nd	0.12 nd	0.12 nd	0.12	0.12															
98	Nickel	g/hr		45.4	47.5	47.5	43.8	45.6															
99	Selenium	g/hr		1.4 nd	1.3 nd	1.3 nd	1.3	1.3															
100	Silver	g/hr		0.17 nd	0.16 nd	0.16 nd	0.16	0.2															
101	Thallium	g/hr		0.36 nd	0.34 nd	0.34 nd	0.34	0.3															
102	Zinc	g/hr		0.872	1.4	1.4	1.68	1.3															
103																							
104	Stack Gas Flowrate	dscfm		8646	8274	8274	8180	8366.7															
105	Oxygen	%		2.8	2.9	2.9	2.9	2.9															
106																							
107	Estimated Firing Rate	MMBtu/hr																					
108																							
109	Feedrate MTEC Calculations																						
110	Ash	mg/dscm		6.8	7.7	7.7	7.7	7.4															
111	Chlorine	ug/dscm		354931	322426	322426	269155	315504.0															
112	Antimony	ug/dscm		23.5	21.9	21.9	18.9	21.4															
113	Arsenic	ug/dscm		100	3.7	3.5	3.0	3.4															
114	Barium	ug/dscm		7.3	7.7	7.7	6.3	7.1															
115	Beryllium	ug/dscm		2.3	2.3	2.3	1.9	2.2															
116	Cadmium	ug/dscm		1.9	2.0	2.0	3.2	2.4															
117	Chromium	ug/dscm		128.7	124.9	124.9	92.0	115.2															
118	Lead	ug/dscm		100	24.1	22.5	25.8	24.1															
119	Mercury	ug/dscm		100	7.2	7.1	6.1	6.8															
120	Nickel	ug/dscm		2730.2	2811.2	2811.2	2238.5	2593.3															



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	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y
121	Selenium		ug/dscm		84.2	76.9	76.9	66.4	66.4	82.100	75.9	84.2	84.2	76.9	76.9	66.4	66.4	75.9	75.9					
122	Silver		ug/dscm	100	10.2	100	9.5	100	8.2	100	9.3	100	10.2	100	9.5	100	8.2	100	9.3					
123	Thallium		ug/dscm	100	21.6	100	20.1	100	17.4	100	19.7	100	21.6	100	20.1	100	17.4	100	19.7					
124	Zinc		ug/dscm		52.4		82.9		85.9		73.7		52.4		82.9		85.9		73.7					
125	SVM		ug/dscm	93	25.9	92	24.5	89	29.0	91	26.5	93	25.9	92	24.5	89	29.0	91	26.5					
126	LVM		ug/dscm	2.8	134.7	2.7	130.6	3.1	96.9	2.8	120.8	2.8	134.7	2.7	130.6	3.1	96.9	2.8	120.8					

	A	B	C
1	<b>Process Information</b>		
2			Cond Avg
3	<b>2020C1</b>	trial burn	
4			
5	Comb Temp	°F	2732.0
6	Prod Rate	klb/hr	22.0
7	Comb Air Flow (back end)	klb/hr	10.0
8	Comb Air Flow (front end)	klb/hr	24.7
9	APC Scrubber Blowdown	lb/hr	2921.0
10	APC Scrubber pH	pH	8.0
11	Quench Scrubber Recir. Rate	lb/hr	2.8
12	Acid Scrubber Recir. Ratio	lb/lb	1.2
13			
14	<b>2020C2</b>	trial burn	
15			
16	Comb Temp	°F	2186.6
17	Prod Rate	klb/hr	15.0
18	Comb Air Flow (back end)	klb/hr	16.0
19	Comb Air Flow (front end)	klb/hr	25.0
20	APC Scrubber Blowdown	lb/hr	12496.0
21	APC Scrubber pH	pH	9.0
22	Quench Scrubber Recir Rate	lb/hr	4.3
23	Acid Scrubber Recir Ratio	lb/lb	2.3
24			
25	<b>2020C3</b>	risk burn	
26			
27	Comb Temp	°F	2640.2
28	Prod Rate	klb/hr	22
29	APC Scrubber Blowdown	gpm	20.75
30	APC Scrubber pH	pH	8.31
31	Quench Scrubber Recir Rate	lb/hr	4.79
32	Acid Scrubber Recir Ratio	lb/lb	2.9

A	B	C	D	E	F	G	H	I	J	K	L		M		N		O		P		Q		R
											TEQ	Total	TEQ	Total	TEQ	Total	TEQ	Total	TEQ	Total	TEQ	Total	
1	PCDD/PCDF																						
2	N																						
3	Facility Name and ID:	Dow Chemical Company, Freeport TX																					
4	Condition ID:	2020C3																					
5	Condition/Test Date:	Risk burn, normal operating cond of liq feed and comb temp, March 21-22, 2000																					
6																							
7		I-TEF																					
8		Wght Fact																					
9																							
10		Detected in sample volume (pg)																					
11		2,3,7,8-TCDD	1	nd	25.3	25.3	13	12.7	29.9	29.9	29.9	29.9	29.9	29.9	29.9	29.9	29.9	28	27.7	28	27.7	28	27.7
12		Total TCDD	0		2240	0.0	2240	0.0	2680	0	2680.0	0	2680.0	0	2680.0	0	2680.0	2860	0.0	2860	0.0	2860	0.0
13		1,2,3,7,8-PCDD	0.5		79.0	39.50	79	39.50	125.00	62.50	62.50	62.50	62.50	62.50	62.50	62.50	62.50	109	54.5	109	54.5	109	54.5
14		Total PCDD	0		2410	0	2410	0	3790	0	3790.0	0	3790.0	0	3790.0	0	3790.0	3430	0.0	3430	0.0	3430	0.0
15		1,2,3,4,7,8-HxCDD	0.1		48.0	4.80	48	4.80	107.0	10.70	10.70	10.70	10.70	10.70	10.70	10.70	10.70	97.0	9.70	97	9.70	97	9.70
16		1,2,3,6,7,8-HxCDD	0.1		125.0	12.50	125	12.50	290.0	29.00	29.00	29.00	29.00	29.00	29.00	29.00	29.00	27.0	2.7	27	2.7	27	2.7
17		1,2,3,7,8,9-HxCDD	0.1		64.0	6.40	64	6.40	146.0	14.60	14.60	14.60	14.60	14.60	14.60	14.60	14.60	148.0	14.8	148	14.8	148	14.8
18		Total HxCDD	0		2420	0	2420	0	5900	0	5900.0	0	5900.0	0	5900.0	0	5900.0	5300	0	5300	0	5300	0
19		1,2,3,4,6,7,8-HpCDD	0.01		400	4.00	400	4.00	1010	10.10	10.10	10.10	10.10	10.10	10.10	10.10	10.10	1090	10.90	1090	10.90	1090	10.90
20		Total HpCDD	0		740	0	740	0	1830	0	1830.0	0	1830.0	0	1830.0	0	1830.0	1880	0	1880	0	1880	0
21		OCDD	0.001		380	0.380	380	0.380	930	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	1060	1.060	1060	1.060	1060	1.060
22		Total Dioxins	0		8190	0.000	8190	0.000	15100	0	15100.0	0	15100.0	0	15100.0	0	15100.0	14500	0	14500	0	14500	0
23		2,3,7,8-TCDF	0.1		232	23.20	232	23.20	280	28	280	28	280	28	280	28	280	253	25	253	25	253	25
24		Total TCDF	0		4190	0	4190	0	4690	0	4690.0	0	4690.0	0	4690.0	0	4690.0	3940	0	3940	0	3940	0
25		1,2,3,7,8-PCDF	0.05		382	19.10	382	19.10	530	26.5	26.5	26.5	26.5	26.5	26.5	26.5	26.5	480	24	480	24	480	24
26		2,3,4,7,8-PCDF	0.5		356	178.00	356	178.00	550	275	275	275	275	275	275	275	275	540	270.0	540	270.0	540	270.0
27		Total PCDF	0		4170	0.0	4170	0.0	5200	0	5200.0	0	5200.0	0	5200.0	0	5200.0	4800	0	4800	0	4800	0
28		1,2,3,4,7,8-HxCDF	0.1		387	38.70	387	38.70	660	66	660	66	660	66	660	66	660	590	59	590	59	590	59
29		1,2,3,6,7,8-HxCDF	0.1		363	36.30	363	36.30	590	59.0	59.0	59.0	59.0	59.0	59.0	59.0	59.0	560	56	560	56	560	56
30		2,3,4,6,7,8-HxCDF	0.1		117	11.70	117	11.70	210	21.0	21.0	21.0	21.0	21.0	21.0	21.0	21.0	218	21.8	218	21.8	218	21.8
31		1,2,3,7,8,9-HxCDF	0.1		212	21.20	212	21.20	400	40	400	40	400	40	400	40	400	410	41.0	410	41.0	410	41.0
32		Total HxCDF	0		2420	0	2420.0	0	4000	0	4000.0	0	4000.0	0	4000.0	0	4000.0	3800	0	3800	0	3800	0
33		1,2,3,4,6,7,8-HpCDF	0.01		580	5.80	580	5.80	1090	10.90	10.90	10.90	10.90	10.90	10.90	10.90	10.90	1070	10.70	1070	10.70	1070	10.70
34		1,2,3,4,7,8,9-HpCDF	0.01		180	1.80	180	1.80	370	3.70	3.70	3.70	3.70	3.70	3.70	3.70	3.70	400	4.00	400	4.00	400	4.00
35		Total HpCDF	0		1120	0	1120	0	2170	0	2170.0	0	2170.0	0	2170.0	0	2170.0	2260	0	2260	0	2260	0
36		OCDF	0.001		199	0.20	199	0.20	350	0.350	0.350	0.350	0.350	0.350	0.350	0.350	0.350	400	0.400	400	0.400	400	0.400
37		Total Furans	0		12100	0	12100	0	16400	0	16400.0	0	16400.0	0	16400.0	0	16400.0	15200	0	15200	0	15200	0
38																							
39		Gas sample volume (dscf)			135.01	135.01	135.01	135.01	137.24	137.24	137.24	137.24	137.24	137.24	137.24	137.24	137.24	132.54	132.54	132.54	132.54	132.54	132.54
40		O2 (%)*			2.8	2.8	2.8	2.8	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9	2.9
41																							
42		PCDD/PCDF (pg in sample)			428.88	20290.0	416.23	416.23	688.180	31500.0	688.180	688.180	688.180	688.180	688.180	688.180	688.180	633.56	29700.0	633.56	29700.0	633.56	633.56
43		PCDD/PCDF (ng/dscm @ 7% O2)	5.9		0.086	4.085	0.084	0.084	0.14	6.273	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.0	6.124	0.131	6.124	0.131	
44																							
45																							
46		TEQ Cond Avg			0.117																		
47		Total Cond Avg			5.49																		