

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

On September 3, 2010, Conestoga-Rovers & Associates (CRA) submitted this fugitive benzene emission measurement test report to the U.S. Environmental Protection Agency (EPA) on behalf of the Tonawanda Coke Corporation (TCC). The test report contains benzene emission data that were collected at TCC's coke manufacturing facility from May 25 through 28, 2010, using DIAL and UV DOAS equipment.

Prior to conducting the DIAL and UV DOAS measurements, EPA approved a DIAL test protocol that was collaboratively developed by CRA, EPA and the New York State Department of Environmental Conservation, in consultation with the National Physical Laboratory (NPL), the operator of the DIAL equipment. The DIAL and UV DOAS measurements were conducted in accordance with the approved protocol, including the data quality assurance provisions.

EPA has reviewed the data in this report and has determined that it can be used to estimate TCC's facility-wide annual benzene emission rate for regulatory compliance purposes, notwithstanding CRA's statements in the Executive Summary.

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