



COMPLIANCE TEST REPORT

for

RELATIVE RESPONSE AUDIT (RRA)

PARTICULATE MATTER CONTINUOUS EMISSIONS MONITORING SYSTEM (PM CEMS)

EU-BOILER7-SC – Stack

St. Clair Power Plant
East China, Michigan

September 9, 2020

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EXECUTIVE SUMMARY

DTE Energy's Environmental Management and Safety (EMS) Field Services Group performed a Relative Response Audit (RRA) on the Particulate Matter Continuous Emissions Monitoring System (PM CEMS). The RRA was performed on the EU-BOILER7-SC FGD exhaust stack located at the St. Clair Power Plant, in East China, Michigan. The testing is required by 40 CFR Part 63, Subpart UUUUU. Testing was performed in accordance with Procedure 2 of 40 CFR Part 60, Appendix F. The testing was conducted on September 9, 2020.

A summary of the emission test results are shown below. Criterion for acceptable RRA results are located in Procedure 2 Sec 10.4(6)(i-ii):

**Relative Response Audit
EU-BOILER7-SC Stack
St. Clair Power Plant
September 9, 2020**

	PM CEMS (mg/acm) ¹	RM PM (mg/acm) ¹	PM CEMS (correlation)	Correlation (-25% Emission Limit)	Correlation (+25% Emission Limit)
PM-1	6.1	3.15	1.2	-4.0	6.4
PM-2	6.5	0.68	1.3	-3.9	6.5
PM-3	6.7	1.13	1.3	-3.9	6.5
PM CEMS < Greatest PM CEMS Response on correlation regression line				≤52.3 mg/acm	Pass
2 of 3 PM CEMS and RM w/in 25% of numerical emission limit on correlation regression line					Pass

⁽¹⁾mg/acm @ stack conditions



1.0 INTRODUCTION

DTE Energy's Environmental Management and Safety (EMS) Field Services Group performed a Relative Response Audit (RRA) on the Particulate Matter Continuous Emissions Monitoring System (PM CEMS). The RRA was performed on the EU-BOILER7-SC FGD exhaust stack located at the St. Clair Power Plant, in East China, Michigan. The testing is required by 40 CFR Part 63, Subpart UUUUU. Testing was performed in accordance with Procedure 2 of 40 CFR Part 60, Appendix F. The testing was conducted on September 9, 2020.

Testing was performed pursuant to Title 40, *Code of Federal Regulations*, Part 60, Appendix A (40 CFR §60 App. A), Methods 1-5. Criterion for acceptable RRA results are located in Part 60, Appendix F Procedure 2 Sec 10.4(6)(i-ii).

The fieldwork was performed in accordance with EPA Reference Methods and EMR's Intent to Test.¹ The following EMR Field Services personnel participated in the testing program: Mr. Mark Grigereit, Principal Engineer, Mr. Thomas Snyder, Environmental Specialist and Mr. Fred Meinecke, Senior Environmental Technician. Mr. Grigereit was the project leader. Coordination with the facility was performed by Mr. Dominic Vendittelli, Environmental Engineer.

2.0 SOURCE DESCRIPTION

The St Clair Power Plant (SCPP) located at 4901 Pointe Drive in East China Township, Michigan, employs the use of four (4) coal-fired boilers (Units 2-3, 6, and 7). Units 2-3 each have Babcock and Wilcox boilers capable of producing 1,070,000 pounds per hour of steam. Units 2 and 3 have Allis Chalmers turbine generators each with a nominally rated capability of 170 MW. Units 6 and 7 have Combustion Engineering boilers capable of producing 2,100,000 and 3,580,000 pounds of steam per hour respectively. The turbine generators on each unit were manufactured by Westinghouse and have a nominally rated capability of 325 and 500 megawatts respectively.

St. Clair Power Plant utilizes Sick AG Maihak SP100 dust measuring systems. The analyzers utilize a measuring technique based off scattered light principal. The SP100 model is specific for low to medium dust collections. The following unit was audited:

Unit	Analyzer	Manufacturer/Model	Analyzer Range	Serial Number
Unit 7	PM	Sick/ Maihak SP100	200 mg/acm	15288503

¹ EGLE, Test Plan, Submitted November 5, 2019. (Attached-Appendix A)

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3.0 SAMPLING AND ANALYTICAL PROCEDURES

DTE Energy obtained emissions measurements in accordance with procedures specified in the USEPA *Standards of Performance for New Stationary Sources*. The sampling and analytical methods used in the testing program are indicated in the table below

Sampling Method	Parameter	Analysis
USEPA Methods 1-2	Exhaust Gas Flow Rates	Field data analysis and reduction
USEPA Method 3A	O ₂ & CO ₂	Instrumental Analyzer Method
USEPA Method 4	Moisture Content	Field data analysis and reduction
USEPA Method 5 - MATS Modified	Particulate Matter	Gravimetric Analysis

3.1 **STACK GAS VELOCITY AND FLOWRATES (USEPA Methods 1-2)**

3.1.1 **Sampling Method**

Stack gas velocity traverses were conducted in accordance with the procedures outlined in USEPA Method 1, "Sample and Velocity Traverses for Stationary Sources," and Method 2, "Determination of Stack Gas Velocity and Volumetric Flowrate." Four (4) sampling ports were utilized on each unit's exhaust stack, sampling at four (4) points per port for a total of twelve (12) points. Velocity traverses were conducted simultaneously with the particulate sampling. See Figure 1 for a diagram of the traverse/sampling points used.

Cyclonic flow checks were performed on each stack during the initial flow monitor certification RATAs. Testing at the sampling location demonstrated that no cyclonic flow was present at either location. No changes to the stacks have occurred since the cyclonic flow checks were performed. Additionally, verifications of null angle at 0° were observed while performing static pressure checks on each unit.

3.1.2 **Method 2 Sampling Equipment**

The EPA Method 2 sampling equipment consisted of a 0-10" incline manometer, S-type Pitot tube ($C_p = 0.84$) and a Type-K calibrated thermocouple.

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3.2 OXYGEN & CARBON DIOXIDE (USEPA Method 3A)

3.2.1 *Sampling Method*

Oxygen (O₂) and carbon dioxide (CO₂) emissions were evaluated using USEPA Method 3A, "Gas Analysis for Carbon Dioxide, Oxygen, Excess Air, and Dry Molecular Weight (Instrumental Analyzer Method)". The analyzers utilize paramagnetic sensors.

3.2.2 *O₂/CO₂ Sampling Train*

The EPA Method 3A sampling system (Figure 2) consisted of the following:

- (1) PTFE sampling line (collecting gas sample from the meter rig exhaust)
- (2) Servomex MiniMP 5200 O₂/CO₂ gas analyzer
- (3) Appropriate USEPA Protocol 1 calibration gases

3.2.3 *Sampling Train Calibration*

The O₂ and CO₂ analyzers were calibrated per procedures outlined in USEPA Methods 3A. Zero, span, and mid-range calibration gases were introduced directly into the analyzer to verify the instruments linearity, prior to sampling. Mid and zero gases (upscale and downscale) were introduced again at the completion of each test run.

3.3 MOISTURE DETERMINATION (USEPA Method 4)

3.3.1 *Sampling Method*

Determination of the moisture content of the exhaust gas was performed using USEPA Method 4, "Determination of Moisture Content in Stack Gases". The moisture was collected in the Method 5 glass impingers, and the percentage of water was then derived from calculations outlined in USEPA Method 4.

3.4 PARTICULATE MATTER (USEPA Method 5 - MATS Modified)

3.4.1 *Filterable Particulate Sampling Method*

USEPA Method 5 - MATS Modified, "Determination of Particulate Emissions from Stationary Sources" was used to measure the filterable (front-half) particulate emissions (see Figure 3 for a schematic of the sampling train). Triplicate, 60-minute test runs were conducted.

The Method 5 - MATS Modified modular isokinetic stack sampling system consisted of the following:

- (1) stainless-steel button-hook nozzle
- (2) Heated quartz-lined probe
- (3) Heated 3" glass filter holder with a quartz filter

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(Maintained at a temperature of 320 ± 25 °F)

- (4) Set of impingers for the collection of condensate for moisture determination
- (5) Length of sample line
- (6) Environmental Supply[®] control case equipped with a pump, dry gas meter, and calibrated orifice.

The quartz filters used in the sampling were initially baked for 3 hours at 320 °F, desiccated for 24 hours and weighed to a constant weight as described in Method 5 - MATS Modified to obtain the initial tare weight.

After completion of the final leak test for each test run, the filter was recovered, and the probe, nozzle and the front half of the filter holder assembly were brushed and rinsed with acetone. The acetone rinses were collected in a pre-cleaned sample container. The container was labeled with the test number, test location, test date, and the level of liquid marked on the outside of the container. Immediately after recovery, the sample containers were placed in a cooler for storage.

At the laboratory the acetone rinses were transferred to clean pre-weighed PTFE beaker liners and evaporated to dryness at ambient temperature and pressure. The beaker liners and filters were desiccated for 24 hours and weighed to a constant weight (within 0.5 mg). The data sheets containing the initial and final weights on the filters and beakers can be found in Appendix C.

Collected field blanks consisted of a blank filter and acetone solution blank. The acetone blank was collected from the rinse bottle used in sample recovery. The blank filter and acetone were collected and analyzed following the same procedures used to recover and analyze the field samples. Field data sheets for the Method 5 - MATS Modified sampling can be found in Appendix B.

3.4.2 Quality Control and Assurance

All sampling and analytical equipment was calibrated per the guidelines referenced in EPA Method 5 - MATS Modified. All Method 1-5 calibration data is in Appendix D.

3.4.3 Data Reduction

The filterable PM emissions data collected during the testing were calculated and reported as mg/acm @ stack conditions.

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4.0 OPERATING PARAMETERS

The test program included the collection of PM CEMS emission data and Load during each PM emissions test. Data collected during the testing is presented in Appendix E.

5.0 DISCUSSION OF RESULTS

Table 1 presents the EU-BOILER7-SC Reference Method particulate emission testing results (RM PM), particulate matter continuous emissions monitoring system (PM CEMS) results, PM CEMS correlation (expected point on the correlation regression line) value, and $\pm 25\%$ of the emission limit along the correlation regression line. Particulate emissions are presented in milligram per actual cubic meter calculated at stack conditions (mg/acm).

In order to pass an RRA, each of the following criteria must be met: Procedure 2 10.4(6)(i-ii).

- i) For all three data points, the PM CEMS response value can be no greater than the greatest PM CEMS response value used to develop the correlation curve.
- ii) At least two of the three sets of PM CEMS and Reference Method measurements must fall within the same specified area on a graph of the correlation regression line as required for the RRA and described in paragraph (6)(ii). "The specific area on the graph of the correlation regression line is defined by two lines parallel to the correlation regression line, offset at a distance of $\pm 25\%$ of the numerical emission limit value from the correlation regression line.

All the requirements were successfully met. Testing results provided in Table 1 "Unit 7 PM CEMS RRA Results" and Table 2 "Unit 7 PM CEMS RRA – Summary Graph."



6.0 CERTIFICATION STATEMENT

"I certify that I believe the information provided in this document is true, accurate, and complete. Results of testing are based on the good faith application of sound professional judgment, using techniques, factors, or standards approved by the Local, State, or Federal Governing body, or generally accepted in the trade."

A handwritten signature in black ink, appearing to be 'M. Grigereit', written over a horizontal line.

Mark Grigereit, QSTI

This report prepared by:

A handwritten signature in black ink, appearing to be 'M. Grigereit', written over a horizontal line.

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RESULTS TABLES



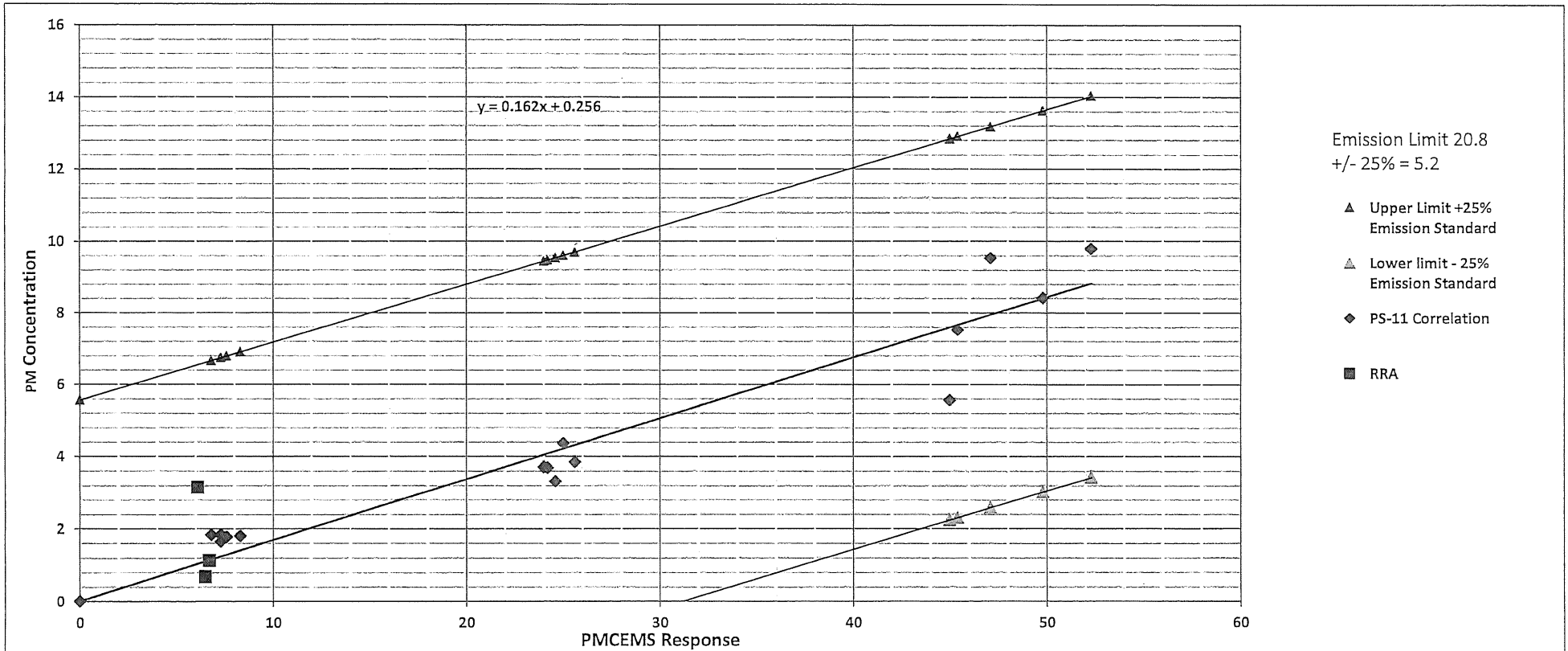
TABLE NO. 1
PARTICULATE MATTER CONTINUOUS EMISSIONS MONITORING SYSTEM
RELATIVE RESPONSE AUDIT RESULTS
St Clair Power Plant - EU-BOILER7-SC
September 9, 2020

Test	Test Time	Unit Load (GMW)	Stack Temperature (°F)	Stack Moisture (%)	Stack Velocity (ft/min)	Exhaust Gas Flowrates			PM CEMS (mg/acm ¹)	RM PM (mg/acm ¹)	PM CEMS (correlation)	Correlation (-25% Emission limit ²)	Correlation (+25% Emission limit ²)
						(ACFM)	(SCFM)	(DSCFM)					
PM-1	7:45-8:56	251	274	9.8	5,083	1,022,048	734,614	662,477	6.1	3.15	1.2	-4.0	6.4
PM-2	9:12-10:35	246	274	8.9	5,201	1,045,779	751,756	684,838	6.5	0.68	1.3	-3.9	6.5
PM-3	10:56-12:02	259	280	9.9	5,046	1,014,463	723,251	651,763	6.7	1.13	1.3	-3.9	6.5

(1) concentration @ stack conditions

(2) ±25% emission limit (5.2 mg/acm)

TABLE No. 2
 ST. CLAIR POWER PLANT
 EU-BOILER7-SC
 RELATIVE RESPONSE AUDIT
 CORRELATION GRAPH
 September 9, 2020



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FIGURES

Figure 1 – Sampling Location & Traverse Points
 St Clair Power Plant – Unit 7
 September 9, 2020

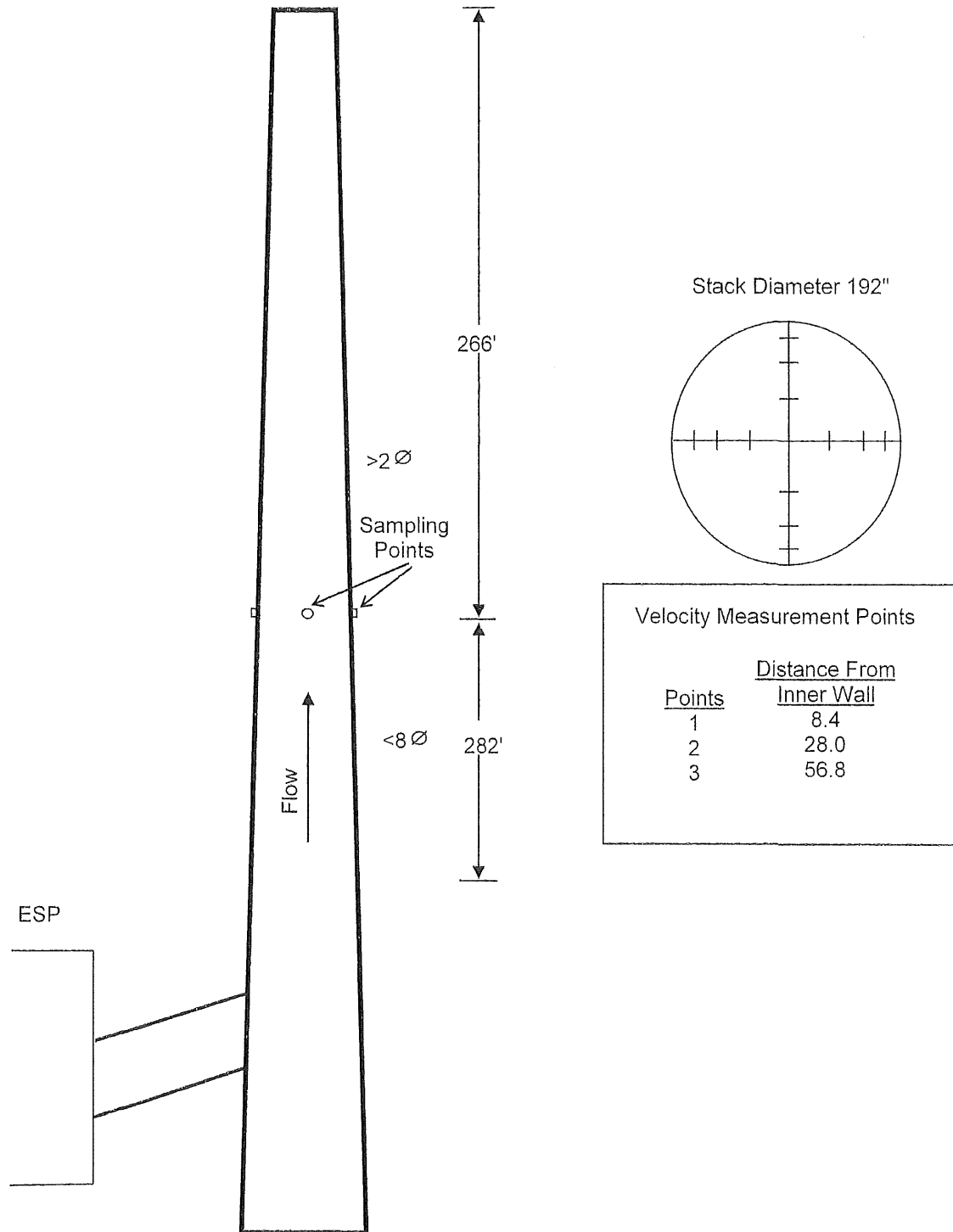


Figure 2 – EPA Method 3A
St Clair Power Plant – Unit 7
September 9, 2020

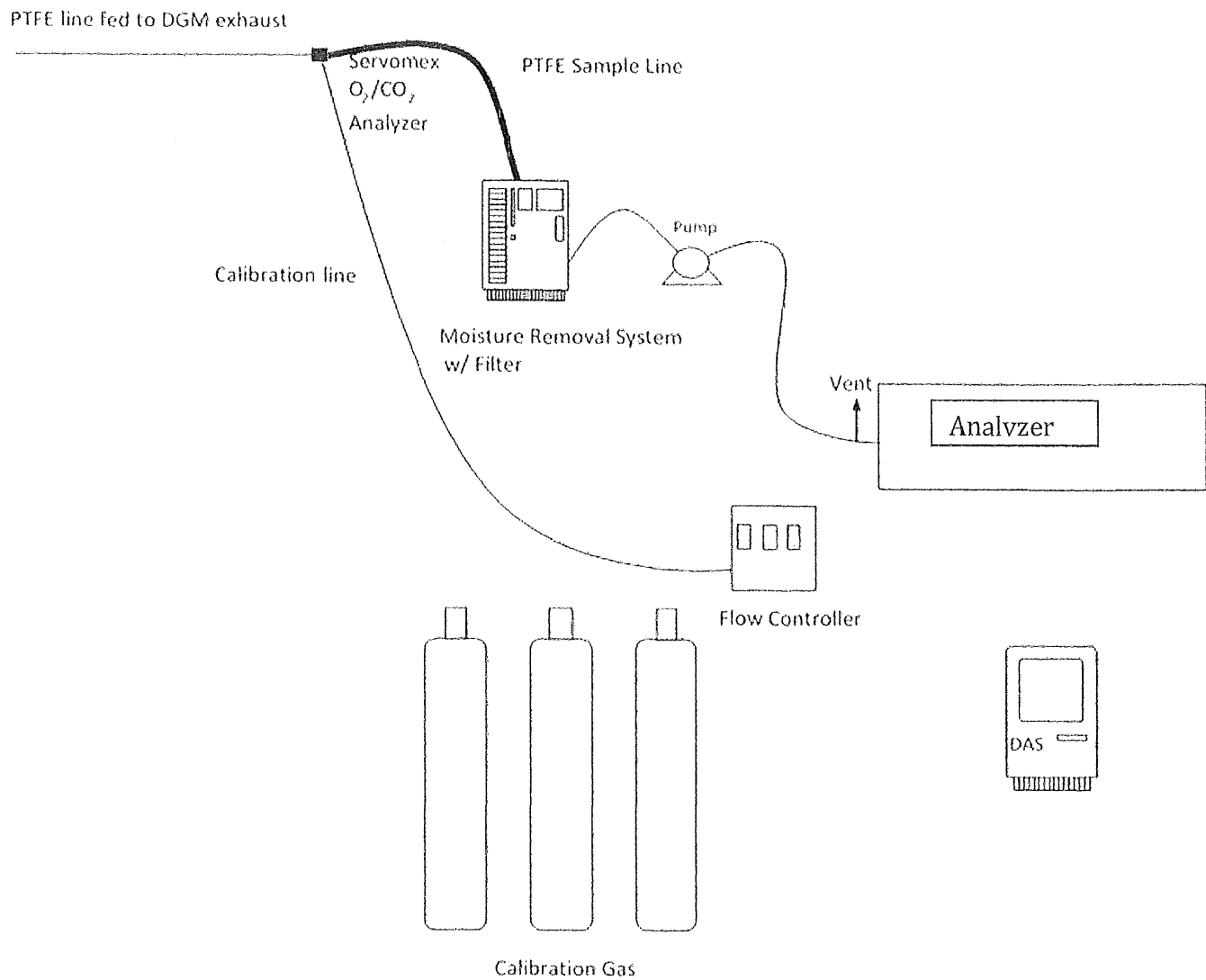
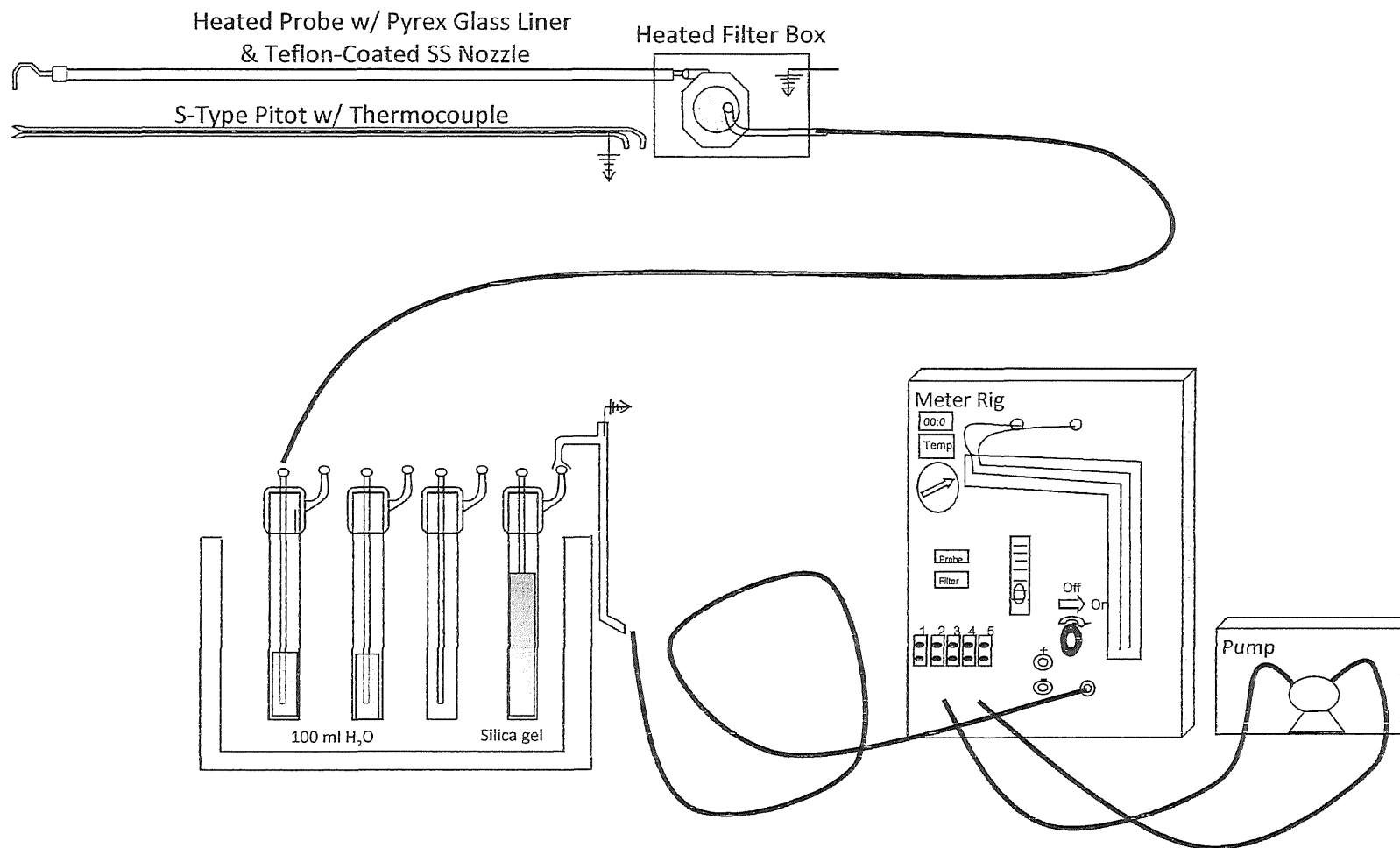


Figure 3 – EPA Method 5 – MATS Modified
St Clair Power Plant - Unit 7
September 9, 2020



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APPENDIX A

EGLE TEST PLAN