



COMPLIANCE TEST REPORT

for

CARBON MONOXIDE EMISSIONS (CO)

UNITS 12-1 to 12-5

SRN: B2803

**Placid Substation
Clarkston, Michigan**

June 1-4, 2021

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EXECUTIVE SUMMARY

DTE Energy's Environmental Management & Safety (EM&S) Ecology, Monitoring, & Remediation Group, performed emissions testing on five (5) 3,600 Brake-HP diesel engines located at the Placid Substation in Clarkston, Michigan. The fieldwork, performed on June 1-4, 2021 was conducted to satisfy requirements of MI-ROP-B2803-2018a, and 40CFR Part 63 Subpart ZZZZ. Emission tests were performed on Units 12-1 to 12-5 for carbon monoxide (CO) destruction efficiency.

The results of the emissions testing are highlighted below:

CO Emissions Test Results Placid Substation June 1-4, 2021

Date	Unit	Average CO Destruction Efficiency (%)
6-1-21	12-5	90.4
6-1-21	12-4	93.5
6-2-21	12-3	90.3
6-3-21	12-2	90.0* 17.2 @ 15% O ₂
6-4-21	12-1	90.9

- Unit 12-2 Inlet Run 2 – Results indicate an O₂ leak. Compliance based on outlet CO Emissions

Subpart ZZZZ Limit: Limit the concentration of CO in the stationary RICE exhaust to 23 ppmvd or less at 15% O₂; or Reduce CO emissions by 70% or more



1.0 INTRODUCTION

DTE Energy's Environmental Management & Safety (EM&S) Ecology, Monitoring, & Remediation Group, performed emissions testing on five (5) 3,600 Brake-HP diesel engines located at the Placid Substation in Clarkston, Michigan. The fieldwork, performed on June 1-4, 2021 was conducted to satisfy requirements of MI-ROP-B2803-2018a, and 40CFR Part 63 Subpart ZZZZ. Emission tests were performed on Units 12-1 to 12-5 for carbon monoxide (CO) destruction efficiency.

Testing was performed pursuant to Title 40, *Code of Federal Regulations*, Part 60, Appendix A (40 CFR §60 App. A), Methods 3A and 10.

The fieldwork was performed in accordance with EPA Reference Methods, the requirements outlined in MI-ROP-B2803-2018a, 40CFR Part 63 Subpart ZZZZ, and EM&S's intent to test¹, test plan submittal, which was approved in a letter by Mr. Matt Karl from the Michigan Department of Environment, Great Lakes, and Energy (EGLE) dated November 17, 2020. The following EM&S personnel participated in the testing program: Mr. Thomas Snyder, Sr. Environmental Specialist, Mr. Mark Grigereit, Principal Engineer, and Mr. Fred Meinecke, Senior Engineering Technician. Ms. Stefanie Ledesma, Environmental Engineer with DTE Electric, provided process coordination for the testing program.

2.0 SOURCE DESCRIPTION

The Placid Substation located at 4912 Edgar Rd, Clarkston, Michigan, employs the use of five General Motors EM&D, Model 20-645-E4, 20 cylinder, 3,600 Horse Power diesel engines (Units 12-1 to 12-5) purchased in 1970 and installed November 21, 1970. The engines generate supplemental electrical power during peak electrical demand periods or when required for load stability. On site diesel generators produce the electrical power supply which is sent to the electrical grid. Each unit can produce approximately 2.5 GMW at full load conditions.

The emissions from the engines are exhausted through individual catalyst beds and to the atmosphere through individual exhaust stacks.

During the emissions testing the engines were operated at 100% load conditions (2.5 MW). Each unit is equipped with a current transformer (CT) and a potential transformer (PT), which is used to measure and calculate MW output of the generator. The MW meter in the switch

¹ EGLE, Test Plan, Submitted September 18, 2020. (Attached-Appendix A)

² EGLE, Approval Letter (Attached-Appendix A)

gear displays unit load output. When in operation, each unit is designed to run at 100% load only.

A schematic representation of the engines exhausts and sampling locations are presented in Figure 1. Sampling was performed in the duct prior to and downstream of the catalyst bed.

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 Method 3A	Oxygen	Instrumental Analyzer Method
USEPA Method 10	Carbon Monoxide	NDIR Instrumental Analyzer Method

3.1 OXYGEN AND CARBON MONOXIDE (USEPA METHODS 3A AND 10)

3.1.1 Sampling Method

Oxygen (O₂) emissions were evaluated using USEPA Method 3A, "Gas Analysis for Carbon Dioxide, Oxygen, Excess Air, and Dry Molecular Weight (Instrumental Analyzer Method)". The O₂ analyzer utilizes a paramagnetic sensor.

Carbon monoxide (CO) emissions were evaluated using USEPA Method 10, "Determination of Carbon Monoxide Emissions from Stationary Sources". The CO analyzer utilizes a NDIR detector.

3.1.2 O₂ and CO Sampling Train

The EPA Methods 3A and 10 sampling systems at the inlet and outlet (Figure 2) consisted of the following components:

- (1) Single-point stainless steel sampling probe with a cindered filter.
- (2) Heated PTFE™ sampling line.
- (3) Universal® and MAK® gas conditioners with a particulate filter.

- (4) Flexible unheated PTFE sampling line.
- (5) Servomex 1400 O₂/CO₂ gas analyzer and TECO 48i NDIR CO gas analyzer.
- (6) USEPA Protocol 1 calibration gases.
- (7) Data Acquisition System.

3.1.3 Sampling Train Calibration

The O₂ / CO sampling trains were calibrated per procedures outlined in USEPA Methods 3A & 10. Zero, span, and mid-range calibration gases were introduced directly into the CO and O₂ analyzers to determine the instruments linearity. A zero and mid-range span gas was then introduced through the entire sampling system to determine sampling system bias for each analyzer. Additional system calibrations were performed at the completion of each test.

3.1.4 Sampling Duration & Frequency

The emissions testing of each engine consisted of triplicate 60-minute samples at the inlet and exhaust of the catalyst. Testing was conducted at three points across the diameter of the exhaust duct during each run. Sampling was performed simultaneously for O₂ and CO. Data was recorded as 1-minute averages.

3.1.5 Quality Control and Assurance (O₂ and CO)

All sampling and analytical equipment was calibrated per the guidelines referenced in Methods 3A and 10. Calibration gases were EPA Protocol 1 gases and the concentrations were within the acceptable ranges (40-60% mid-range and span) specified in Method 7E. Calibration gas certification sheets are in Appendix C.

3.1.6 Data Reduction

The O₂ and CO emission readings in percent (%) and parts per million (ppm) were recorded at 4-second intervals and averaged to 1-minute increments. The CO emissions were normalized to 15% O₂, and that number was used to determine CO % Destruction Efficiency (DE) or outlet emissions as required by 40CFR Part 63 Subpart ZZZZ. Emission calculations are based upon calculations found in USEPA Methods 3A, 7E, 10 and 19. Example calculations can be found in Appendix D.

The 1-minute O₂ and CO readings collected can be found in Appendix B.

4.0 OPERATING PARAMETERS

The test program included the collection of catalyst inlet temperature (°F), catalyst pressure drop ("H₂O), and crank case vacuum ("H₂O). Ambient temperature (°F), Relative Humidity (%), and Barometric Pressure (in) were also recorded during each test. Operational and atmospheric data collected during the testing is in Appendix E.



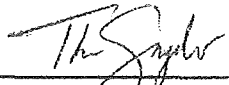
5.0 RESULTS

Tables 1-5 present the CO emissions @ 15% O₂ results from Units 12-1 to 12-5. The CO emissions are presented in parts per million (ppm) for the inlet and outlet and the destruction efficiency in percent (%). Also presented are the Oxygen inlet and outlet in percent (%), the catalyst inlet temperature in degrees Fahrenheit (°F), and pressure drop across the catalyst in inches of water ("H₂O). The results of the testing indicate that Units 12-1 to 12-5 comply with MI-ROP-B2803-2018a, and 40CFR Part 63 Subpart ZZZZ requirements of reducing CO emissions by 70% or outlet emissions of 23 ppm @ 15%O₂.




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."



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RESULTS TABLES



TABLE NO. 1
CARBON MONOXIDE (CO) EMISSION TESTING RESULTS
Unit 12-5 Placid Substation
June 1, 2021

Test	Time	Load (MW)	Catalyst		Oxygen ⁽¹⁾		CO Emissions @ 15% O ₂ ⁽¹⁾		Destruction Efficiency (%)
			Inlet Temperature (°F)	Catalyst Pressure Drop (¹ H ₂ O)	Inlet (%)	Outlet (%)	Inlet (ppm)	Outlet (ppm)	
Run - 1	9:06-10:06	2.5	800	-0.025	10.9	10.9	270.8	31.4	88.4
Run - 2	10:18-11:18	2.5	812	-0.025	10.8	10.8	283.8	25.1	91.1
Run - 3	11:34-12:34	<u>2.5</u>	<u>813</u>	<u>-0.025</u>	<u>10.8</u>	<u>10.8</u>	<u>288.7</u>	<u>24.3</u>	<u>91.6</u>
	<i>Avg:</i>	2.5	808	-0.025	10.8	10.8	281.1	26.9	90.4

⁽¹⁾ Corrected for analyzer drift per USEPA method 7E

40CFR Part 63 Subpart ZZZZ Limit: 70% DE



TABLE NO. 2
CARBON MONOXIDE (CO) EMISSION TESTING RESULTS
Unit 12-4 Placid Substation
June 1, 2021

Test	Time	Load (MW)	Catalyst Inlet Temperature (°F)	Catalyst Pressure Drop ($"\text{H}_2\text{O}$)	Oxygen ⁽¹⁾		CO Emissions @ 15% O ₂ ⁽¹⁾		Destruction Efficiency (%)
					Inlet (%)	Outlet (%)	Inlet (ppm)	Outlet (ppm)	
Run - 1	12:50-13:50	2.5	780	0.005	11.0	10.9	307.7	20.7	93.3
Run - 2	14:00-15:00	2.5	790	0.006	10.9	10.9	311.5	19.6	93.7
Run - 3	15:13-16:13	<u>2.5</u>	<u>793</u>	<u>0.007</u>	<u>10.9</u>	<u>10.9</u>	<u>307.4</u>	<u>20.3</u>	<u>93.4</u>
	<i>Avg:</i>	2.5	788	0.006	10.9	10.9	308.9	20.2	93.5

⁽¹⁾ Corrected for analyzer drift per USEPA method 7E

40CFR Part 63 Subpart ZZZZ Limit: 70% DE



TABLE NO. 3
CARBON MONOXIDE (CO) EMISSION TESTING RESULTS
Unit 12-3 Placid Substation
June 2, 2021

Test	Time	Load (MW)	Catalyst Inlet Temperature (°F)	Catalyst Pressure Drop ($"H_2O$)	Oxygen ⁽¹⁾		CO Emissions @ 15% O ₂ ⁽¹⁾		Destruction Efficiency (%)
					Inlet (%)	Outlet (%)	Inlet (ppm)	Outlet (ppm)	
Run - 1	8:53-9:53	2.5	770	-0.026	11.1	11.1	255.2	25.6	90.0
Run - 2	10:03-11:03	2.5	782	-0.026	11.1	11.1	258.7	24.6	90.5
Run - 3	11:13-12:13	<u>2.5</u>	<u>784</u>	<u>-0.026</u>	<u>11.1</u>	<u>11.1</u>	<u>255.5</u>	<u>24.7</u>	<u>90.3</u>
	<i>Avg:</i>	2.5	779	-0.026	11.1	11.1	256.5	25.0	90.3

⁽¹⁾ Corrected for analyzer drift per USEPA method 7E

40CFR Part 63 Subpart ZZZZ Limit: 70% DE



TABLE NO. 4
CARBON MONOXIDE (CO) EMISSION TESTING RESULTS
 Unit 12-2 Placid Substation
 June 3, 2021

Test	Time	Load (MW)	Catalyst		Oxygen ⁽¹⁾		CO Emissions @ 15% O ₂ ⁽¹⁾		Destruction Efficiency (%)
			Inlet Temperature (°F)	Pressure Drop ("H ₂ O)	Inlet (%)	Outlet (%)	Inlet (ppm)	Outlet (ppm)	
Run - 1	9:00-10:00	2.5	720	0.005	11.6	11.6	172.1	17.9	89.6
Run - 2	10:12-11:12	2.5	724	0.005	12.4 ⁽²⁾	11.5	167.8	16.8	90.0
Run - 3	11:23-12:23	<u>2.5</u>	<u>731</u>	<u>0.004</u>	<u>11.5</u>	<u>11.5</u>	<u>179.5</u>	<u>17.0</u>	<u>90.5</u>
	Avg:	2.5	725	0.005	11.6	11.5	173.1	17.2	90.0

⁽¹⁾ Corrected for analyzer drift per USEPA method 7E

⁽²⁾ Unit 12-2 Inlet Run 2 – Results indicate an O₂ leak. Compliance based on outlet CO Emissions

40CFR Part 63 Subpart ZZZZ Limit: 70% DE



TABLE NO. 5
CARBON MONOXIDE (CO) EMISSION TESTING RESULTS
 Unit 12-1 Placid Substation
 June 4, 2021

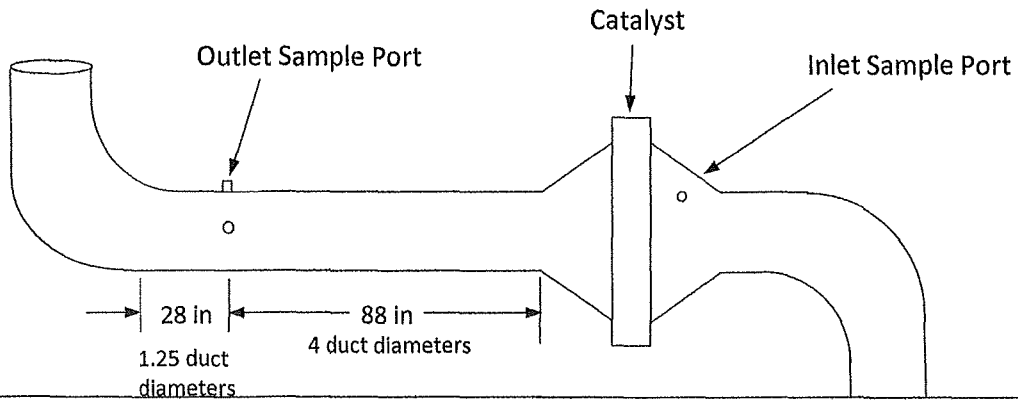
Test	Time	Load (MW)	Catalyst Inlet Temperature (°F)	Catalyst Pressure Drop ($"H_2O$)	Oxygen ⁽¹⁾		CO Emissions @ 15% O ₂ ⁽¹⁾		Destruction Efficiency (%)
					Inlet (%)	Outlet (%)	Inlet (ppm)	Outlet (ppm)	
Run - 1	9:13-10:13	2.5	712	0.003	11.9	11.8	136.3	12.9	90.5
Run - 2	10:28-11:28	2.5	722	0.003	11.9	11.8	138.4	12.4	91.0
Run - 3	11:38-12:38	<u>2.5</u>	<u>730</u>	0.003	<u>11.9</u>	<u>11.8</u>	<u>143.0</u>	<u>12.6</u>	<u>91.2</u>
	<i>Avg:</i>	2.5	721	0.003	11.9	11.8	139.2	12.6	90.9

⁽¹⁾ Corrected for analyzer drift per USEPA method 7E
 40CFR Part 63 Subpart ZZZZ Limit: 70% DE

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FIGURES

Figure 1 - Stack Drawing & Sampling Location
Placid Substation Diesel Generators
June 1-4, 2021

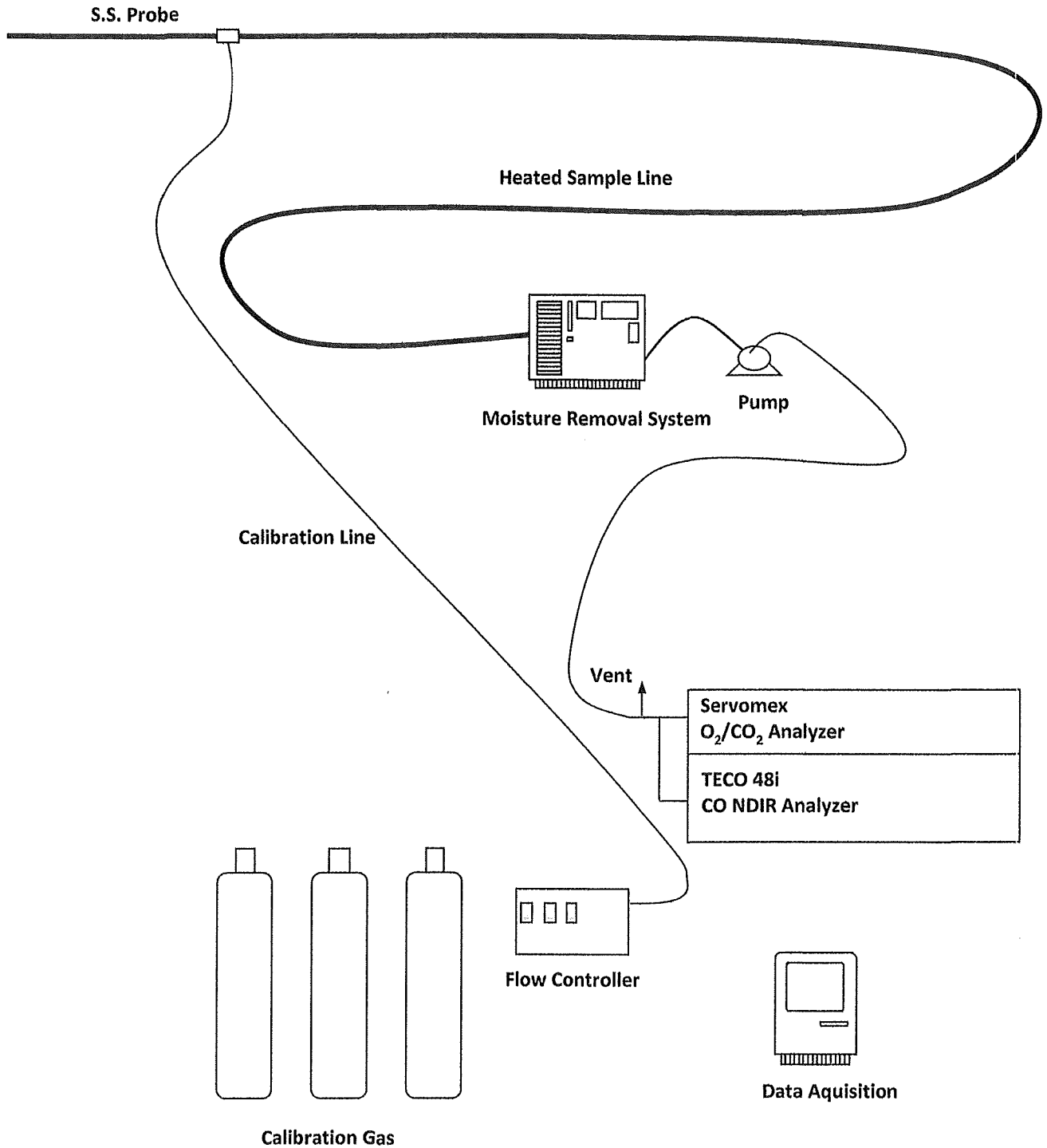


Outlet Point	Distance
Point 1	3.67 in
Point 2	11.00 in
Point 3	18.33 in

Duct Diameter = 22 in

Diesel Generator

Figure 2 – EPA Methods 3A/10
Placid Substation Diesel Generators
June 1-4, 2021



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APPENDIX A

EGLE TEST PLAN