Derenzo Environmental Services *Consulting and Testing*

EMISSIONS TEST REPORT

NSPS Emission Test Report for a Landfill Gas-to- Energy ICTitleEngine Generator Set at the Waste Management of Michigan
Northern Oaks Recycling and Disposal Facility

Report Date October 12, 2015

Test Date(s) September 9, 2015

Facility Information			
Name	Waste Management of Michigan, Inc.		
	Northern Oaks Recycling and Disposal Facility		
Street Address	513 County Farm Rd		
City, County	Harrison, Clare		
Phone	(989) 539-6111		

Facility Permit Informa	tion	

Testing Contracto	DL.
Company	Derenzo Environmental Services
Mailing	39395 Schoolcraft Road
Address	Livonia, MI 48150
Phone	(734) 464-3880
Project No.	1507003

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RENEWABLE OPERATING PERMIT REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name Waste Management of Michigan Inc. (Northern Oaks)	County Clare
Source Address 513 N. County Farm Road	City Harrison
AQD Source ID (SRN) N6010 ROP No. MI-ROP-N6010- 2013	ROP Section No.
Please check the appropriate box(es):	
Annual Compliance Certification (Pursuant to Rule 213(4)(c))	
 Reporting period (provide inclusive dates): FromTo 1. During the entire reporting period, this source was in compliance with ALL term term and condition of which is identified and included by this reference. The method(s) specified in the ROP. 2. During the entire reporting period this source was in compliance with all term term and condition of which is identified and included by this reference, EXCEP deviation report(s). The method used to determine compliance for each term and unless otherwise indicated and described on the enclosed deviation report(s). 	is and conditions contained in the ROP, each od(s) used to determine compliance is/are the is and conditions contained in the ROP, each if for the deviations identified on the enclosed condition is the method specified in the ROP,
Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)	(c))
Reporting period (provide inclusive dates): From To 1. During the entire reporting period, ALL monitoring and associated recordkeep deviations from these requirements or any other terms or conditions occurred.	ng requirements in the ROP were met and no
2. During the entire reporting period, all monitoring and associated recordkeeping deviations from these requirements or any other terms or conditions occurred, EXO enclosed deviation report(s).	requirements in the ROP were met and no CEPT for the deviations identified on the
☑ Other Report Certification	
Reporting period (provide inclusive dates): From <u>9/9/15</u> To Additional monitoring reports or other applicable documents required by the ROP are Test report for CO, NOx and VOC emissions from a landfill ga	9/9/15 attached as described: s fired CAT G3520C
reciprocating internal combustion engine-EUICENGINE1. (Renew	able Operating Permit
MI-ROP-N6010-2013). Document prepared by Derenzo Environmen	tal Services dated
October 12, 2015.	

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

Terry-Nichols	District Manager	989-539-6111
Name of Responsible Official (print or type)	Title	Phone Number
ling to be		10-16-15
Signature of Responsible Official		Date

* Photocopy this form as needed.

EQP 5736 (Rev 11-04)

[•] Consulting and Testing

NSPS EMISSION TEST REPORT FOR A LANDFILL GAS-TO- ENERGY IC ENGINE GENERATOR SET

WASTE MANAGEMENT OF MICHIGAN NORTHERN OAKS RECYCLING AND DISPOSAL FACILITY

1.0 INTRODUCTION

Waste Management of Michigan, Inc. (WMI) operates one (1) Caterpillar (CAT®) Model No. G3520C gas-fired reciprocating internal combustion (IC) engine and electricity generator set at the Northern Oaks Recycling and Disposal Facility (RDF) in Harrison, Clare County, Michigan. The treated landfill gas (LFG) fueled IC engine generator set (Serial Nos. GZJ00226) is identified as emission unit EUICENGINE1 in Renewable Operating Permit (ROP) MI-ROP-N6010-2013 issued by the Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD).

Pursuant to the requirements of the federal *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines* (40 CFR Part 60 Subpart JJJJ) §60.4243(a)(2)(ii), WMI is required to perform testing for specific regulated air pollutant emissions exhausted from the IC engine-generator set every 8760 operating hours or three years, whichever comes first.

The performance testing for emission unit EUICENGINE1 was conducted on September 9, 2015 by Derenzo Environmental Services (DES), an environmental consulting and testing company in Livonia, Michigan. Mr. Daniel Wilson and Jeff Schlaf of DES performed the testing. Mr. Richard Kunze and Keith Hayes of WMI assisted with process coordination and operating parameter data acquisition. MDEQ-AQD representative Jeremy Howe was on site to witness the test event.

The compliance demonstration consisted of triplicate, one-hour, test runs for the determination of nitrogen oxides (NOx), carbon monoxide (CO), and volatile organic compounds (VOC, as non-methane hydrocarbons) mass emission rates. The exhaust gas sampling and analysis was performed using procedures specified in the Test Protocol dated July 23, 2015, and approved by the MDEQ-AQD on August 13, 2015.

Questions regarding this emission test report should be directed to:

Mr. Daniel Wilson Environmental Consultant DES and Associates, Inc. 39395 Schoolcraft Road Livonia, MI 48150 (734) 464-3880 Debora L. Johnston Environmental Engineer Waste Management of Michigan, Inc. Northern Oaks Landfill 513 County Farm Road Harrison, MI 48625 (989) 308-6967

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Report Certification

This test report was prepared by Derenzo Environmental Services based on field sampling data collected by DES. Facility process data was collected and provided by Waste Management of Michigan employees or representatives.

I certify that the testing was conducted in accordance with the approved test plan unless otherwise specified in this report. I believe the information provided in this report and its attachments are true, accurate, and complete.

Report Prepared By:

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Daniel Wilson Environmental Consultant Derenzo Environmental Services

Reviewed By:

Reffamer

Robert L. Harvey, P.E. General Manager Derenzo Environmental Services

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2.0 <u>SUMMARY OF RESULTS</u>

The exhaust from one (1) LFG-fueled IC engine-generator set (identified as EUICENGINE1) was tested on September 9, 2015 to determine the mass emission rate of NOx, CO and VOC.

Exhaust gas velocity, moisture, oxygen (O_2) content, and carbon dioxide (CO_2) content was determined for each test period to calculate pollutant mass emission rates.

The testing was performed while the IC engine operated at normal base load conditions (i.e., 1,600 kW peak electricity output +/- 10%). Test results and applicable emission limits are provided in the following table. The test results demonstrate compliance with emission limits specified in 40 CFR Part 60, Subpart JJJJ and MI-ROP-N6010-2013.

Pollutant	Results for EUICENGINE1 (g/bhp-hr)	Emission Limits (g/bhp-hr)
NOx	1.23	1.50 g/bhp (ROP-N6010-2013) 2.0 g/bhp-hr (NSPS JJJJ)
СО	2.98	4.15 g/bhp (ROP-N6010-2013) 5.0 g/bhp-hr (NSPS JJJJ)
VOC	0.04	1.0 g/bhp (ROP-N6010-2013) 1.0 g/bhp-hr (NSPS JJJJ)

3.0 SOURCE AND SAMPLING LOCATION DESCRIPTION

3.1 General Process Description

Landfill gas is produced in the Northern Oaks Landfill from the anaerobic decomposition of disposed waste materials. The LFG is collected from active landfill cells using a system of wells that are connected to a central header (gas collection system). The collected LFG is treated and then directed to the Northern Oaks electricity generation facility where it is used as fuel for the CAT® Model No.G3520C IC engine-generator set that produces electricity for transfer to the local utility.

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3.2 Rated Capacities, Type and Quantity of Raw Materials Used

The Caterpillar G3520C engine is a spark ignition, lean-burn, reciprocating internal combustion engine fueled by treated landfill gas. The engine genset has an engine power rating of 2,233 hp at 100% load, and a generator power rating of 1,600 kW. The CAT G3520C IC Engine was tested while operating at baseload conditions, within 10% (+/-) of the maximum electricity generation rate of 1,600 kW. Fuel consumption is regulated to maintain the required heat input rate to support engine operations and is dependent on the fuel heat value (methane content).

3.3 Emission Control System Description

The CAT[®] G3520C IC engine uses an electronic air-to-fuel ratio controller to fire lean fuel mixtures and produce low combustion by-product emissions. Emissions from the combustion of LFG are released uncontrolled into the ambient air through a stack connected to the IC engine exhaust manifold and noise control system (noise muffler).

3.4 Sampling Locations (USEPA Method 1)

The exhaust stack sampling port for the Model G3520C IC engine tested satisfied the USEPA Method 1 criteria for a representative sample location. The inner diameter of the engine exhaust stack is 15.5 inches at the sampling location. Each stack is equipped with two (2) sample ports, opposed 90°, that provide a sampling location 36 inches (3.4 duct diameters) downstream and 76 inches (3.8 duct diameters) upstream from any flow disturbance.

Velocity pressure traverse locations for the sampling points were determined in accordance with USEPA Method 1 for the engine exhaust.

Figure 1 presents the performance test sampling and measurement locations.

4.0 SAMPLING AND ANALYTICAL PROCEDURES

A test protocol for the compliance testing was prepared by DES and reviewed by the MDEQ-AQD. This section provides a summary of the sampling and analytical procedures that were used during the test and presented in the test plan.

Appendix A provides a copy of the MDEQ-AQD test protocol approval letter.

4.1 Exhaust Gas Velocity and Flowrate Determination (USEPA Method 2)

In order to determine air pollutant emission rates on a mass basis (e.g., pound per hour), IC engine exhaust stack gas velocities, and volumetric flow rates were determined using USEPA Method 2 during each 60-minute test. An S-type Pitot tube connected to a red-oil manometer was used to determine velocity pressure. Gas temperature was measured using a K-type

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thermocouple mounted to the Pitot tube. The Pitot tube and connective tubing were leakchecked to verify the integrity of the measurement system.

The absence of cyclonic flow for each sampling location was verified using an S-type Pitot tube and oil manometer. The Pitot tube was positioned at all of the velocity traverse points with the planes of the face openings of the Pitot tube perpendicular to the stack cross-sectional plane. The Pitot tube was then rotated to determine the null angle (rotational angle as measured from the perpendicular, or reference, position at which the differential pressure is equal to zero).

Exhaust gas velocity pressure and temperature were measured before and after each one-hour sampling period in accordance with USEPA Method 2.

4.2 Exhaust Gas Molecular Weight Determination (USEPA Method 3A)

 CO_2 and O_2 content in the IC engine exhaust was measured continuously throughout each onehour test period in accordance with USEPA Method 3A. The CO_2 content of the exhaust was monitored using a non-dispersive infrared (NDIR) gas analyzer. The O_2 content of the exhaust was monitored using a gas analyzer that utilizes a Paramagnetic sensor.

During each one-hour sampling period, a continuous sample of the IC engine exhaust gas stream was extracted from the stack using a stainless steel probe connected to a Teflon® heated sample line. The sampled gas was conditioned by removing moisture prior to being introduced to the analyzer; therefore, measurement of O_2 and CO_2 concentrations correspond to standard dry gas conditions. The instrument was calibrated using appropriate calibration gases to determine accuracy and system bias (described in Section 5.5 of this document).

Figure 2 presents the instrument analyzer sampling train.

4.3 Exhaust Gas Moisture Content Determinations (Method 4)

Moisture content of the IC engine exhaust gas was determined in accordance with USEPA Method 4 using a chilled impinger sampling train, which was performed concurrently with the instrumental analyzer sampling periods. At the conclusion of each sampling period, the moisture gain in the impingers was determined gravimetrically by weighing each impinger to determine net weight gain.

Figure 3 presents the moisture sampling train schematic.

4.4 NOx and CO Concentration Measurements (USEPA Method 7E and 10)

NOx and CO pollutant concentrations in the exhaust of the IC engine were determined using a chemiluminescence NOx analyzer and NDIR CO analyzer.

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Three (3) one-hour sampling periods were performed for the IC engine exhaust testing. Throughout each one-hour test period, a continuous sample of the engine exhaust gas was extracted from the stack using the Teflon® heated sample line and gas conditioning system described in Section 4.2 of this document, and delivered to the instrumental analyzers. Instrument response for each analyzer was recorded on a data logging system that monitored the analog output of the instrumental analyzers continuously and logged data as one-minute averages. Prior to, and at the conclusion of each test, the instruments were calibrated using appropriate upscale calibration and zero gas to determine analyzer calibration error and system bias. Sampling times were recorded on field data sheets.

Figure 2 presents the instrument analyzer train.

4.5 VOC Concentration Measurements (USEPA Method ALT 096)

VOC emission rate was determined by measuring the nonmethane hydrocarbon (NMHC) concentration in the IC engine exhaust gas. NMHC pollutant concentration was determined using a Thermo Environmental Instruments (TEI) Model 55i Methane / Nonmethane hydrocarbon analyzer. The TEI 55i analyzer contains an internal gas chromatograph column that separates methane from non-methane components and has been approved by the USEPA for measuring VOC relative to 40 CFR Part 60 Subpart JJJJ compliance test demonstrations (Alternative Test Method 096 or ALT-096). The concentration of NMHC in the sampled gas stream, after separation from methane, is determined relative to a propane standard using a flame ionization detector in accordance with USEPA Method 25A.

Samples of the exhaust gas were delivered directly to the instrumental analyzer using the Teflon® heated sample line to prevent condensation. The sample to the NHMC analyzer was not conditioned to remove moisture. Therefore, VOC measurements correspond to standard conditions with no moisture correction (wet basis).

The instrumental analyzer was calibrated using certified propane concentrations in hydrocarbonfree air to demonstrate detector linearity and determine calibration drift and zero drift error.

Figure 2 presents the instrument analyzer train.

Appendix A provides a copy of the USEPA ALT 096 approval letter.

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5.0 <u>QA/QC ACTIVITIES</u>

5.1 NOx Converter Efficiency Test

The $NO_2 - NO$ conversion efficiency of the TEI Model 42C instrumental analyzer was verified prior to the commencement of the performance tests. The instrument analyzer $NO_2 - NO$ converter uses a catalyst at high temperatures to convert the NO_2 to NO for measurement. A USEPA Protocol 1 certified NO_2 calibration gas was used to verify the efficiency of the $NO_2 - NO$ NO converter.

The $NO_2 - NO$ conversion efficiency test satisfied the USEPA Method 7E criteria (the calculated $NO_2 - NO$ conversion efficiency is greater than or equal to 90%).

5.2 Calibration Gas Divider Field Validation

A STEC Model SGD-710C 10-step gas divider was used to obtain appropriate calibration span gases. The ten-step STEC gas divider was NIST certified (within the last 12 months) with a primary flow standard in accordance with Method 205. When cut with an appropriate zero gas, the ten-step STEC gas divider delivered calibration gas values ranging from 0% to 100% (in 10% step increments) of the USEPA Protocol 1 calibration gas that was introduced into the system. The field evaluation procedures presented in Section 3.2 of Method 205 were followed prior to use of gas divider. The field evaluation yielded no errors greater than 2% of the triplicate measured average and no errors greater than 2% from the expected values.

5.3 Sampling System Response Time Determination

The response time of the sampling system was determined prior to the compliance test program by introducing upscale gas and zero gas, in series, into the sampling system using a tee connection at the base of the sample probe. The elapsed time for the analyzer to display a reading of 95% of the expected concentration was determined using a stopwatch.

Sampling periods did not commence until the sampling probe had been in place for at least twice the system response time.

5.4 Instrumental Analyzer Interference Check

The instrumental analyzers used to measure NOx, CO, O_2 and CO_2 have had an interference response test performed prior to their use in the field, pursuant to the interference response test procedures specified in USEPA Method 7E. The appropriate interference test gases (i.e. gases that would be encountered in the exhaust gas stream) were introduced into each analyzer, separately and as a mixture with the analyte that each analyzer is designed to measure. All of analyzers exhibited a composite deviation of less than 3.0% of the span for all measured interferent gases. No major analytical components of the analyzers have been replaced since

performing the original interference tests.

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5.5 Instrument Calibration and System Bias Checks

At the beginning of each day of the testing program, initial three-point instrument calibrations were performed for the NO_x , CO, CO_2 and O_2 analyzers by injecting calibration gas directly into the inlet sample port for each instrument. System bias checks were performed prior to and at the conclusion of each sampling period by introducing the upscale calibration gas and zero gas into the sampling system (at the base of the stainless steel sampling probe prior to the particulate filter and Teflon® heated sample line) and determining the instrument response against the initial instrument calibration readings.

At the beginning of each test day, appropriate high-range, mid-range, and low-range span gases followed by a zero gas were introduced to the NMHC analyzer, in series at a tee connection, which is installed between the sample probe and the particulate filter, through a poppet check valve. After each one hour test period, mid-range and zero gases were re-introduced in series at the tee connection in the sampling system to check against the method's performance specifications for calibration drift and zero drift error.

The instruments were calibrated with USEPA Protocol 1 certified concentrations of CO_2 , O_2 , NO_x , and CO in nitrogen and zeroed using hydrocarbon free nitrogen. The NMHC (VOC) instrument was calibrated with USEPA Protocol 1 certified concentrations of propane in air and zeroed using hydrocarbon-free air. A STEC Model SGD-710C ten-step gas divider was used to obtain intermediate calibration gas concentrations as needed.

5.6 Determination of Exhaust Gas Stratification

A stratification test for the IC engine exhaust stack was performed during the performance test sampling periods. The stainless steel sample probe was positioned at sample points correlating to 16.7, 50.0 (centroid) and 83.3% of each stack diameter. Pollutant concentration data were recorded at each sample point for a minimum of twice the maximum system response time.

The recorded data for each IC engine exhaust stack gas indicate that the measured CO concentrations did not vary by more than 5% of the mean across either stack diameter. Therefore, the stack gas of the engine was considered to be unstratified and the compliance test sampling was performed at a single sampling location within the engine exhaust stack.

5.7 Meter Box Calibrations

The dry gas meter sampling console used for moisture testing was calibrated prior to and after the testing program. This calibration uses the critical orifice calibration technique presented in USEPA Method 5. The metering console calibration exhibited no data outside the acceptable ranges presented in USEPA Method 5.

The digital pyrometer in the metering console was calibrated using a NIST traceable Omega® Model CL 23A temperature calibrator.

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Appendix E presents test equipment quality assurance data ($NO_2 - NO$ conversion efficiency test data, instrument calibration and system bias check records, calibration gas certifications, interference test results, meter box calibration records, and Pitot tube calibration records).

6.0 TEST RESULTS AND DISCUSSION

6.1 **Purpose and Objectives of the Tests**

Renewable Operating Permit MI-ROP-N6010-2013 and 40 CFR 60.4243(b)(2)(ii) [40 CFR Part 60 Subpart JJJJ] specify that owners and operators of new stationary spark-ignited IC engines with a power rating greater than 500 horsepower must conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

The recorded engine hours at the beginning of Test No. 1 for EUICENGINE1 were 39,023.8 and are within 8,760 operating hours of those recorded during the previous test event on March 11, 2015.

6.2 Operating Conditions During the Compliance Test

The LFG-fueled IC engine was operated at base load (100% capacity +/- 10%) conditions during the compliance testing. The following Process Operating Data was monitored and recorded during each test run, in 15-minute intervals.

- Engine Load (kW) (for HP calculation)
- Engine Exhaust Temperature
- LFG Fuel flow rate to engine (scfm)
- LFG Methane content (%CH4)
- LFG Fuel flow to Leachate Evaporator (scfm)
- LFG Fuel flow to Flare (scfm)

Engine output (bhp) cannot be measured directly. Therefore, it is calculated based on the recorded electricity output, the generator efficiency (96.1%), and the unit conversion factor for kW to horsepower (0.7457 kW/hp). The following equation was used to calculate average engine horsepower for each test period based on a linear relationship between engine output and electricity generator output:

Engine output (bhp) = Electricity output (kW) / (0.96) / (0.7457 kW/hp)

Fuel flow data was recorded from the fuel flow meters installed and operated by WMI. LFG methane content was recorded by the on-site GC.

Appendix B provides engine generator process data collected during the compliance test.

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6.3 Air Pollutant Sampling Results

The exhaust for the LFG-fueled IC engine was monitored for three (3) one-hour test periods, during which the NOx, CO, VOC, O₂, and CO₂ concentrations were measured using instrumental analyzers. The measured pollutant concentrations were adjusted based on instrument calibrations performed prior to and following each test period (drift and bias corrected pursuant to equations in specified in the USEPA reference test methods).

Exhaust gas moisture content was determined by gravimetric analysis of the weight gain in chilled impingers in accordance with USEPA Method 4. Exhaust gas velocity was measured prior to and following each one hour test period. The calculated exhaust gas volumetric flowrate (average of the pre-test and post-test measurements) was used to calculate NOx, CO and VOC mass emission rates based on the measured pollutant concentrations (parts per million by volume).

Table 1 presents measured exhaust gas conditions and calculated air pollutant emission rates for each test run.

Appendix C provides computer calculated and field data sheets for the IC engine tests.

Appendix D provides raw instrumental analyzer response data for each test period.

6.4 Variations from Normal Sampling Procedures or Operating Conditions

The compliance tests for all pollutants were performed in accordance with the Test Protocol dated July 23, 2015; the USEPA ALT-096 Approval Letter dated August 13, 2015, and the specified USEPA test methods.

Instrument calibrations and sampling period results satisfied the quality assurance verifications required by USEPA Methods 3A, 7E, 10, and ALT 096. No variations from the normal operating conditions of the IC engine occurred during the testing program.

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Table 1.	Measured Exhaust Gas Conditions and Air Pollutant Emission Rates for the CAT®
	G3520C LFG-Fueled Engine, EUICENGINE1

Test No.	1	2	3	
Test Date	09/09/15	09/09/15	09/09/15	Test
Test Period (24-hr clock)	9:20-10:20	11:31-12:31	13:00-14:00	Avg.
Generator output (kW)	1,619	1,615	1,614	1,616
Engine Horsepower (bhp)	2,259	2,253	2,252	2,255
Engine Fuel Use (scfm)	527	526	527	527
LFG Methane content (%)	51.4	51.9	51.8	51.7
LFG heat content (Btu/scf)	468	472	471	470
Fuel to Flare (scfm)	0	0	0	0
Fuel to leachate evap. (scfm)	367	372	372	370
Exhaust gas composition				
CO ₂ content (% vol)	12.0	11.9	11.9	11.9
O ₂ content (% vol)	6.84	6.90	6.94	6.89
Moisture (% vol)	12.9	12.9	11.9	12.6
Exhaust gas flowrate				
Exhaust Temperature (°F)	890	888	888	889
Standard conditions (scfm)	4,581	4,625	4,611	4,605
Dry basis (dscfm)	3,989	4,050	4,061	4,033
Nitrogen oxides emission rates				
NO _X conc. (ppmvd)	192	221	220	211
NO _X emissions (lb/hr NO ₂)	5.50	6.42	6.41	6.11
NO _x emissions (g/bhp-hr)	1.10	1.29	1.29	1.23
NO_x permit limit (g/bhp-hr)				1.50
Carbon monoxide emission rates				
CO conc. (ppmvd)	854	837	834	842
CO emissions (lb/hr)	14.9	14.8	14.8	14.8
CO emissions (g/bhp-hr)	2.99	2.98	2.98	2.98
CO permit limit (g/bhp-hr)				4.15
VOC/NMHC emission rates				
VOC conc. (ppmv C ₃)	4.3	7.5	7.2	6.3
VOC emissions (lb/hr)	0.13	0.24	0.23	0.20
VOC emissions (g/bhp-hr)	0.03	0.05	0.05	0.04
VOC permit limit (g/bhp-hr)				1.0





