



**Mercury and Air Toxics Standard Particulate Matter and
Hydrogen Chloride Emissions Test Report**

**Lansing Board of Water and Light
Eckert Station
Unit 6 ESP Outlet Duct
Lansing, Michigan
October 20 and 21, 2016**

**Report Submittal Date
November 30, 2016**

RECEIVED

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Project No. M163003E

1.0 EXECUTIVE SUMMARY

MOSTARDI PLATT conducted a Mercury and Air Toxics Standards (MATS) filterable particulate matter and hydrogen chloride emissions test program for the Lansing Board of Water and Light at the Eckert Station on the Unit 6 ESP Outlet Duct in Lansing, Michigan on October 20 and 21, 2016. This report summarizes the results of the test program and test methods used.

The test location, test dates, and test parameters are summarized below.

TEST INFORMATION		
Test Location	Test Date	Test Parameters
Unit 6 ESP Outlet Duct	October 20 and 21, 2016	Filterable Particulate Matter (FPM) and Hydrogen Chloride (HCl)

The purpose of the test program was to document FPM and HCl emissions to qualify for the LEE designation as required by 40 CFR Part 63, Subpart UUUUU. Selected results of the test program are summarized below. A complete summary of emission test results follows the narrative portion of this report.

TEST RESULTS			
Test Location	Test Parameter	Emission Limits	Emission Rates
Unit 6 ESP Outlet Duct	FPM	≤ 0.030 lb/mmBtu	0.0038 lb/mmBtu
		≤ 0.015 lb/mmBtu (LEE Status)*	
	HCl	≤ 0.002 lb/mmBtu	0.0009 lb/mmBtu
		≤ 0.001 lb/mmBtu (LEE Status)**	

*LEE designation for FPM is established if the FPM emissions measured during the initial compliance test and all subsequent quarterly testing completed over the initial 3-year period are less than 50% of the applicable emission limit, which equates to 0.015 lb/mmBtu.

** LEE designation for HCl is established if the HCl emissions measured during the initial compliance test and all subsequent quarterly testing completed over the initial 3-year period are less than 50% of the applicable emission limit, which equates to 0.001 lb/mmBtu.

Emissions on lb/mmBtu basis were determined using a standard F_d -Factor of 9,820 dscf/mmBtu for sub-bituminous coal. Plant operating data as provided by Lansing Board of Water and Light is included in Appendix A.

The Stationary Source Audit Sample Program audit sample was obtained from ERA and submitted for analysis to Maxxam Analytical. The results of the audit sample was compared to the assigned value by ERA and found to be acceptable. The audit sample result and evaluation are appended to this report.

The identifications of the individuals associated with the test program are summarized below.

TEST PERSONNEL INFORMATION		
Location	Address	Contact
Test Coordinator	Lansing Board of Water and Light 1232 Haco Drive P.O. Box 13007 Lansing, Michigan 48912	Ms. Trista Gregorski Environmental Engineer (517)702-6865 (phone) tmg@LBWL.COM
Test Facility	Lansing Board of Water and Light Eckert Station 601 Island Ave Lansing, Michigan 48901	
Testing Company Representative	Mostardi Platt 888 Industrial Drive Elmhurst, Illinois 60126	Mr. Chris Trezak Project Manager (630) 993-2100 (phone) ctrezak@mp-mail.com

The test crew consisted of Messrs. B. Garcia, D. Dixon, and C. Trezak of Mostardi Platt.

2.0 TEST METHODOLOGY

Emissions testing was conducted following the methods specified in 40CFR60, Appendix A. A schematic of the test section diagram is found in Appendix B and schematics of the sampling trains used are included in Appendix C. Calculation nomenclature and sample calculations are included in Appendix D. Laboratory analysis data are found in Appendix E. Copies of analyzer print-outs for each test run are included in Appendix F and field data sheets are found in Appendix G.

The following methodologies were used during the test program:

Method 1 Traverse Point Determination

Test measurement points were selected in accordance with Method 1. The characteristics of the measurement location are summarized below.

TEST POINT INFORMATION				
Location	Upstream Diameters	Downstream Diameters	Test Parameter	Number of Sampling Points
Unit 6 ESP Outlet Duct	0.49	1.95	FPM, HCl	32

Method 2 Volumetric Flowrate Determination

Gas velocity was measured following Method 2, for purposes of calculating stack gas volumetric flow rate. An S-type pitot tube, differential pressure gauge, thermocouple and temperature readout were used to determine gas velocity at each sample point. All of the equipment used was calibrated in accordance with the specifications of the Method. Calibration data are presented in Appendix H.

Method 3A Oxygen (O₂)/Carbon Dioxide (CO₂) Determination

Stack gas molecular weight was determined in accordance with Method 3A. A Ecom analyzer was used to determine stack gas oxygen and carbon dioxide content and, by difference, nitrogen content. All of the equipment used was calibrated in accordance with the specifications of the Method. Calibration data are presented in Appendix H and copies of the gas cylinder certifications are found in Appendix I.

Method 5 Filterable Particulate Matter (FPM) Determination

Stack gas FPM concentrations and emission rates were determined in accordance with USEPA Method 5, 40CFR60, Appendix A. An Environmental Supply Company, Inc. sampling train was used to sample stack gas at an isokinetic rate, as specified in the Method. Filter and probe temperatures were elevated to 320° Fahrenheit as described in 40CFR63, Subpart UUUUU. Particulate matter in the sample probe was recovered using an acetone rinse. The probe wash and filter catch were analyzed by Mostardi Platt in accordance with the Method in the Elmhurst, Illinois laboratory. Sample analysis data are found in Appendix E. All of the equipment used was calibrated in accordance with the specifications of the Method. Calibration data are presented in Appendix H.

Method 26A Hydrogen Chloride (HCl) Determination

Stack gas HCl concentrations and emission rates were determined in accordance with Method 26A, 40CFR60, Appendix A. An Environmental Supply Company sampling train was used to sample stack gas, in the manner specified in the Method. Analyses of the samples collected were conducted by Maxxam Analytics, Inc. of Mississauga, Ontario. Sample analysis data are found in Appendix E. All of the equipment used was calibrated in accordance with the specifications of the Method. Calibration data are presented in Appendix H.

3.0 TEST RESULT SUMMARIES

Client: Lansing Board of Water and Light
Facility: Eckert Station
Test Location: Unit 6 ESP Outlet Duct
Test Method: 5 MATS

	Source Condition	High Load	High Load	High Load	
	Date	10/20/16	10/20/16	10/20/16	
	Start Time	7:55	10:25	12:55	
	End Time	10:03	12:32	15:02	
		Run 1	Run 2	Run 3	Average
Stack Conditions					
Average Gas Temperature, °F		345.7	351.4	357.9	351.7
Flue Gas Moisture, percent by volume		11.2%	11.3%	11.5%	11.3%
Average Flue Pressure, in. Hg		28.48	28.48	28.48	28.48
Gas Sample Volume, dscf		76.214	74.878	74.547	75.213
Average Gas Velocity, ft/sec		58.929	58.390	58.189	58.503
Gas Volumetric Flow Rate, acfm		318,216	315,304	314,221	315,914
Gas Volumetric Flow Rate, dscfm		176,332	173,119	170,759	173,403
Gas Volumetric Flow Rate, scfm		198,476	195,258	193,049	195,594
Average %CO ₂ by volume, dry basis		13.6	14.0	13.7	13.8
Average %O ₂ by volume, dry basis		5.4	5.3	5.7	5.5
Isokinetic Variance		104.1	104.2	105.2	104.5
Standard Fuel Factor Fd, dscf/mmBtu		9,820.0	9,820.0	9,820.0	9,820.0
Filterable Particulate Matter (Method 5 MATS)					
grams collected		0.0115	0.0086	0.0090	0.0097
mg/dscm		5.329	4.056	4.263	4.5494
grains/acf		0.0013	0.0010	0.0010	0.0011
grains/dscf		0.0023	0.0018	0.0019	0.0020
lb/hr		3.519	2.630	2.727	2.959
lb/mmBtu (Standard Fd Factor)		0.0044	0.0033	0.0036	0.0038

Client: Lansing Board of Water and Light
 Facility: Eckert Station
 Test Location: Unit 6 ESP Outlet Duct
 Test Method: 26A

Source Condition	High Load	High Load	High Load	
Date	10/21/16	10/21/16	10/21/16	
Start Time	7:35	9:57	12:14	
End Time	9:42	12:04	14:21	
	Run 1	Run 2	Run 3	Average
Stack Conditions				
Average Gas Temperature, °F	343.3	343.8	351.0	346.0
Flue Gas Moisture, percent by volume	11.1%	11.2%	11.1%	11.1%
Average Flue Pressure, in. Hg	28.59	28.59	28.59	28.59
Gas Sample Volume, dscf	72.456	71.459	74.508	72.808
Average Gas Velocity, ft/sec	55.877	57.126	57.995	56.999
Gas Volumetric Flow Rate, acfm	301,734	308,482	313,175	307,797
Gas Volumetric Flow Rate, dscfm	168,424	171,877	173,076	171,126
Gas Volumetric Flow Rate, scfm	189,467	193,583	194,794	192,615
Average %CO ₂ by volume, dry basis	14.6	14.0	13.9	14.2
Average %O ₂ by volume, dry basis	5.8	4.6	4.6	5.0
Isokinetic Variance	103.6	100.1	103.7	102.5
Standard Fuel Factor Fd, dscf/mmBtu	9,820.0	9,820.0	9,820.0	9,820.0
Hydrogen Chloride (HCl) Emissions				
ug of sample collected	2,300	2,200	2,000	2,167
ppm	0.74	0.72	0.63	0.69
mg/dscm	1.12	1.09	0.95	1.05
lb/hr	0.707	0.700	0.615	0.674
lb/mmBtu (Standard Fd Factor)	0.0010	0.0009	0.0007	0.0009

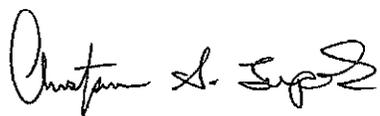
4.0 CERTIFICATION

MOSTARDI PLATT is pleased to have been of service to Lansing Board of Water and Light. If you have any questions regarding this test report, please do not hesitate to contact us at 630-993-2100.

CERTIFICATION

As project manager, I hereby certify that this test report represents a true and accurate summary of emissions test results and the methodologies employed to obtain those results, and the test program was performed in accordance with the methods specified in this test report.

MOSTARDI PLATT



Chris Trezak

Program Manager



Scott W. Banach

Quality Assurance