



## EMISSIONS TEST REPORT

for

**40 CFR Part 63, Subpart YYYY  
FORMALDEHYDE (CH<sub>2</sub>O)**

**EUCTGHRSG1 and EUCTGHRSG2  
MI-PTI-19-18**

**DTE Electric Company – Blue Water Energy Center  
China, Michigan**

**August 30-31, 2022**

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## EXECUTIVE SUMMARY

DTE Energy's Environmental Management and Safety (EM&S) Ecology, Monitoring, and Remediation performed emissions testing at the DTE Electric Company – Blue Water Energy Center, located in China, Michigan. The fieldwork, performed August 30-31, 2022, was conducted to satisfy requirements of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Permit to Install No. 19-18 and 40 CFR Part 63 Subpart YYYY. Emissions tests were performed on General Electric turbines Unit 11-1 (EUCTGHRSG1) and Unit 12-1 (EUCTGHRSG2) for formaldehyde (CH<sub>2</sub>O).

The results of the emissions testing are highlighted below:

**Emissions Test Results  
Blue Water Energy Center  
EUCTGHRSG1-2  
August 30-31, 2022**

<b>Emission Unit</b>	<b>O<sub>2</sub> (%)</b>	<b>CH<sub>2</sub>O (ppbvd @ 15% O<sub>2</sub>)</b>
EUCTGHRSG1	12.2	7.1
EUCTGHRSG2	12.2	4.5
<i>Permit Limit</i>		<b>91</b>



## 1.0 INTRODUCTION

DTE Energy's Environmental Management and Safety (EM&S) Ecology, Monitoring, and Remediation performed emissions testing at the DTE Electric Company – Blue Water Energy Center, located in China, Michigan. The fieldwork, performed August 30-31, 2022, was conducted to satisfy requirements of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Permit to Install No. 19-18 and 40 CFR Part 63 Subpart YYYY. Emissions tests were performed on General Electric turbines Unit 11-1 (EUCTGHRSG1) and Unit 12-1 (EUCTGHRSG2) for formaldehyde (CH<sub>2</sub>O).

The following DTE personnel participated in the testing program: Thomas Snyder, Senior Environmental Specialist, Mark Grigereit, Principal Engineer, and Fred Meinecke, Environmental Specialist.

## 2.0 SOURCE DESCRIPTION

The Blue Water Energy Center consists of two combustion turbines in a combined cycle configuration. A combined cycle electric generating unit consisting of two (2) General Electric ("GE") "H"-class combustion turbines each with maximum fuel type-based heat input of 3,658 million British Thermal Units per hour (MMBtu/hr) (natural gas) coupled with a heat recovery steam generator (HRSG). Each HRSG is equipped with a natural gas-fired duct burner rated at 800 MMBTU/hr to provide heat for additional steam production. The HRSG is not capable of operating independently from the CTG on each unit. The CTG/HRSG is equipped with a combined oxidation catalyst for the control of CO and VOCs, and selective catalytic reduction (SCR) with dry low NO<sub>x</sub> burners for the control of nitrogen oxides. Exhaust emissions from each HRSG are controlled by an oxidation catalyst and selective catalytic reduction (SCR).

Figure 1 presents a schematic of the sampling location for both turbines.

## 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:

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Sampling Method	Parameter	Analysis
USEPA Method 3A	Oxygen	Instrumental Analyzer Method
USEPA Method 320	Formaldehyde	Instrumental Analyzer Method

## 3.1 OXYGEN (USEPA METHOD 3A)

### 3.1.1 Sampling Method

Exhaust Oxygen (O<sub>2</sub>) content was measured using USEPA Method 3A, "Determination of Oxygen and Carbon Dioxide Concentrations in Emissions from Stationary Sources (Instrumental Analyzer Procedure)". The O<sub>2</sub> analyzer utilizes a paramagnetic sensor.

Samples were measured on a dry basis (i.e. sample was conditioned prior to introduction into the diluent analyzers).

### 3.1.2 Sampling Train

The EPA Methods 3A sampling system consisted of the following components:

- (1) Heated Teflon™ sampling line, drawing sample from FTIR exhaust.
- (2) Universal® gas conditioner with particulate filter.
- (3) Flexible unheated Teflon™ sampling line.
- (4) Instrumental gas analyzer bank.
- (5) Data Acquisition System.

Refer to Figure 2 for a schematic of the sampling train.

### 3.1.3 Sampling Train Calibration

The O<sub>2</sub> analyzer was calibrated according to procedures outlined in USEPA Methods 3A and 7E. Zero, span, and mid-range calibration gases were introduced directly into the analyzer to determine the instruments linearity. Then a zero and mid-range span gas was introduced through the entire sampling system to determine sampling system bias. System calibrations were performed prior to, and at the conclusion of, each test period.

### 3.1.4 Sampling Duration & Frequency

Oxygen (O<sub>2</sub>) sampling was performed during all CH<sub>2</sub>O sampling. Concentration averages were logged at 10-second intervals.

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### **3.1.5 Quality Control and Assurance**

All sampling and analytical equipment was calibrated according to the guidelines referenced in Methods 3A and 7E. Calibration gases were EPA Protocol 1 gases. Calibration gas concentrations were within the acceptable ranges specified in Method 7E.

Field calibration data sheets and gas certification sheets are in Appendix C.

### **3.1.6 Data Reduction**

The O<sub>2</sub> (%) readings were logged at 10-second intervals and recorded in 1-minute increments. CH<sub>2</sub>O emissions are reported in parts per billion, dry, corrected to 15% O<sub>2</sub> (ppb @ 15% O<sub>2</sub>) for comparison to the emission limit.

Raw CEM data is presented in Appendix B.

## **3.2 FORMALDEHYDE (CH<sub>2</sub>O) (USEPA METHOD 320)**

### **3.2.1 Sampling Method**

Formaldehyde (CH<sub>2</sub>O) emissions were evaluated using USEPA Method 320, "Measurement of Vapor Phase Organic Emissions by Extractive Fourier Transform Infrared (FTIR)". Triplicate 60-minute test runs were performed.

The Method 320 sampling system (Figure 2) consisted of the following:

- (1) Single-point sampling probe
- (2) Flexible heated PTFE sampling line
- (3) Air Dimensions Heated Head Diaphragm Pump
- (4) MAX Analytical MAX-iR with Starboost™ FTIR spectrometer
- (5) Appropriate calibration gases
- (6) Data Acquisition System

The FTIR was equipped with a temperature controlled, 10 meter, high throughput, multipass gas cell maintained at 191°C. Gas flows and sampling system pressures were monitored using a rotometer and pressure transducer. All data was collected at 1 cm<sup>-1</sup> resolution.

### **3.2.2 Sampling Train Calibration**

The FTIR was calibrated per procedures outlined in Method 320. Direct measurements of formaldehyde (CH<sub>2</sub>O) gas standards were made at the test location to confirm concentrations.

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A calibration transfer standard (CTS) was analyzed before and after testing at each location. The concentration determined for all CTS runs were within  $\pm 5\%$  of the certified value of the standard. Ethylene was passed through the entire system to determine the sampling system response time and to ensure that the entire sampling system was leak-free.

Nitrogen was purged through the sampling system at each test location to confirm the system was free of contaminants.

Formaldehyde ( $\text{CH}_2\text{O}$ ) gas standards were passed through the sampling system at each test location to determine the response time and confirm recovery.

Formaldehyde ( $\text{CH}_2\text{O}$ ) spiking was performed to verify the ability of the sampling system to quantitatively deliver a sample containing  $\text{CH}_2\text{O}$  from the base of the probe to the FTIR. Analyte spiking assures the ability of the FTIR to quantify  $\text{CH}_2\text{O}$  in the presence of effluent gas.

As part of the spiking procedure, samples from each engine were measured to determine  $\text{CH}_2\text{O}$  concentrations to be used in the spike recovery calculations. The determined nitrous oxide ( $\text{N}_2\text{O}$ ) concentration in the spiked and unspiked samples was used to calculate the dilution factor of the spike and thus used to calculate the concentration of the spiked  $\text{CH}_2\text{O}$ . The following equation illustrates the percent recovery calculation.

$$DF = \frac{N_2O(\text{spike})}{N_2O(\text{direct})} \quad (\text{Sec. 9.2.3 (3) Method 320})$$

$$CS = DF * \text{Spike}_{\text{air}} + \text{Unspike} (1 - DF) \quad (\text{Sec. 9.2.3 (4) Method 320})$$

DF = Dilution factor of the spike gas

$N_2O(\text{direct})$  =  $N_2O$  concentration measured directly in undiluted spike gas

$N_2O(\text{spike})$  = Diluted  $N_2O$  concentration measured in a spiked sample

$\text{Spike}_{\text{air}}$  = Concentration of the analyte in the spike standard measured by the FTIR directly

CS = Expected concentration of the spiked samples

Unspike = Native concentration of analytes in unspiked samples

All analyte spikes were introduced using an instrument grade stainless steel rotometer. The spike target dilution ratio was 1:10 or less. All  $\text{CH}_2\text{O}$  spike recoveries were within the EPA Method 320 allowance of  $\pm 30\%$ .

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### **3.2.3 Quality Control and Assurance**

The method validation procedure in Method 320 Section 13 was completed prior to collection of test data, validation data and statistical treatment/analysis included in the report, and emissions data corrected for %R, if applicable. The validation source was a combustion gas turbine fired with natural gas equipped with like-kind emission controls as the unit to be tested. Each validation spiked sample was preceded and followed by an unspiked sample.

As part of the data validation procedure, reference spectra are manually fit to that of the sample spectra and a concentration is determined. The reference spectra are scaled to match the peak amplitude of the sample, thus providing a scale factor. The scale factor multiplied by the reference spectra concentration is used to determine the concentration value for the sample spectra. Sample pressure and temperature corrections are then applied to compute the final sample concentration. The manually calculated results are then compared with the software-generated results. The data is then validated if the two concentrations are within  $\pm 5\%$  agreement. If there is a difference greater than  $\pm 5\%$ , the spectra are reviewed for possible spectral interferences or any other possible causes that might lead to inaccurately quantified data. PRISM Analytical Technologies, Inc. validated the FTIR data. The data validation reports are in Appendix E.

### **3.2.4 Data Reduction**

Each spectrum was derived from the coaddition of 55 scans, with a new data point generated approximately every minute. The CH<sub>2</sub>O emissions were recorded in parts per million (ppb) wet volume basis. The O<sub>2</sub> emissions were recorded in percent (%) dry volume basis.

The O<sub>2</sub> (%) and CH<sub>2</sub>O (ppbvd) readings were logged at 10-second intervals and recorded in 1-minute increments. CH<sub>2</sub>O emissions are reported in parts per billion dry, corrected to 15% O<sub>2</sub> (ppb @ 15% O<sub>2</sub>) for comparison to the emission limit.

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## 4.0 OPERATING PARAMETERS

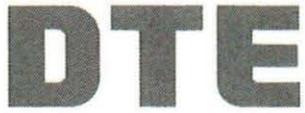
The test program included the collection of turbine operating data during each test run. Parameters recorded included % Load (reported as horsepower), gross dry BTU, fuel feed rate, compressor exhaust pressure, and compressor exhaust temperature.

Operational data can be found in Appendix D.

## 5.0 RESULTS

The results of the formaldehyde (CH<sub>2</sub>O) emissions testing conducted on EUCTGHRSG1-2 are presented in Results Table Nos. 1 and 2.

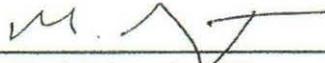
EUCTGHRSG1-2 demonstrated compliance with permitted CH<sub>2</sub>O emission rates. Testing was performed while the turbines were operated in LoNO<sub>x</sub> mode at full load.

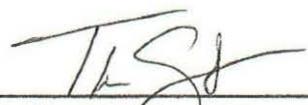


**6.0 CERTIFICATION STATEMENT**

"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."

  
\_\_\_\_\_  
Mark Grigereit, QSTI

This report prepared by:   
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RESULTS TABLES



**TABLE NO. 1**  
**FORMALDEHYDE EMISSIONS TEST RESULTS**  
DTE Gas -Blue Water Energy Center  
EUCTGHRSG1 (Unit 11-1)  
August 30, 2022

Test	Test Time	Unit Load (MW)	O <sub>2</sub> Concentration (% dry) <sup>1</sup>	CH <sub>2</sub> O Concentration (ppbvd)	CH <sub>2</sub> O Concentration (ppbvd @ 15% O <sub>2</sub> )
1-1	9:00-10:00	364	12.2	10.5	7.1
1-2	10:14-11:14	364	12.2	9.5	6.4
1-3	11:32-12:32	363	12.2	11.5	7.8
				<i>Ave:</i>	7.1
				<i>Permit Limit :</i>	91

<sup>1</sup>corrected for analyzer drift as per USEPA Method 7E

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**TABLE NO. 2**  
**FORMALDEHYDE EMISSIONS TEST RESULTS**  
DTE Gas -Blue Water Energy Center  
EUCTGHRSG2 (Unit 12-1)  
August 31, 2022

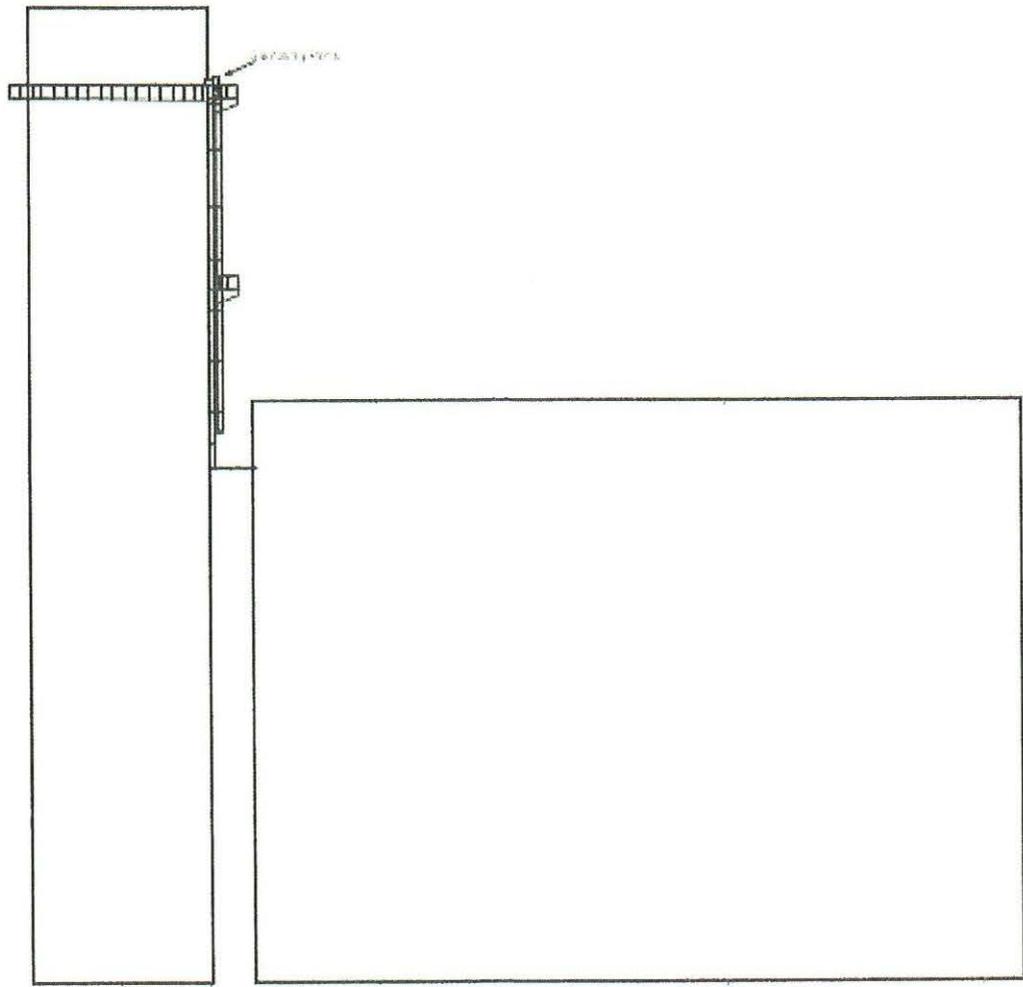
Test	Test Time	Unit Load (MW)	O <sub>2</sub> Concentration (% dry) <sup>1</sup>	CH <sub>2</sub> O Concentration (ppbvd)	CH <sub>2</sub> O Concentration (ppbvd @ 15% O <sub>2</sub> )
1-1	8:44-9:44	374	12.2	8.2	5.5
1-2	9:58-10:58	372	12.2	7.1	4.8
1-3	11:14-12:14	370	12.2	4.5	<u>3.1</u>
				<i>Ave:</i>	<b>4.5</b>
				<i>Permit Limit :</i>	<b>91</b>

<sup>1</sup>corrected for analyzer drift as per USEPA Method 7E

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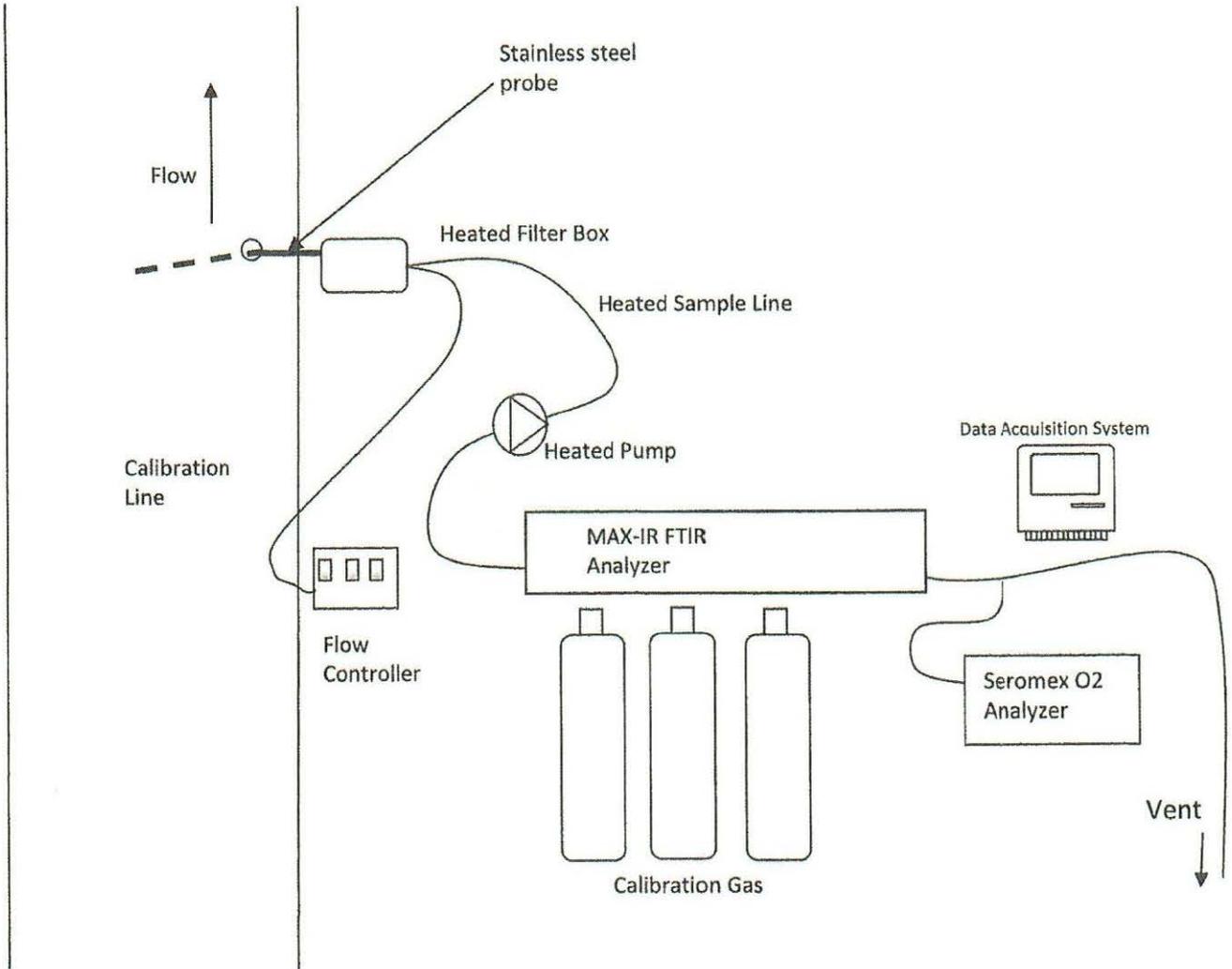
FIGURES

Figure 1 – Stack Drawing & Sampling Location  
EUCTGHRSG1 & EUCTGHRSG2  
Bluewater Energy Center



EUCTGHRSG1  
EUCTGHRSG2

**Figure 2 – Method 3A/320  
EUCTGHRSG1 & EUCTGHRSG2  
Bluewater Energy Center**



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## **APPENDIX A**

**EGLE TEST PLAN AND  
ACCEPTANCE LETTER**