



COMPLIANCE TEST REPORT

for

QUARTERLY HYDROGEN CHLORIDE (HCL) EMISSIONS

UNIT 3

(SRN: B2810)

3rd Quarter 2018

River Rouge Power Plant
River Rouge, Michigan

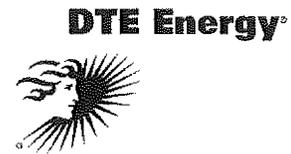
August 8, 2018

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AIR QUALITY DIVISION

Prepared By:
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EXECUTIVE SUMMARY

DTE Energy's Environmental Management and Resources (EM&R) Field Services Group performed 3rd Quarter – 2018 Hydrogen Chloride (HCl) emissions testing on the exhaust of Unit 3 at the River Rouge Power Plant, located in River Rouge, Michigan. The testing was required by 40 CFR Part 63, Subpart UUUUU (Mercury and Air Toxics Standards - MATS) to document quarterly HCl stack emissions. The testing was conducted on August 8, 2018.

A summary of the emission test results are shown below:

Emissions Testing Summary River Rouge Power Plant Unit 3

Source	Date	Load (GMW)	HCl (lbs/MMBtu) ⁽¹⁾
Unit 3	8-8-18	230	0.0006

(1) MATS Limit 0.002 lbs/MMBtu



1.0 INTRODUCTION

DTE Energy's Environmental Management and Resources (EM&R) Field Services Group performed 3rd Quarter – 2018 Hydrogen Chloride (HCl) emissions testing on the exhaust of Unit 3 at the River Rouge Power Plant, located in River Rouge, Michigan. The testing was required by the 40 CFR Part 63, Subpart UUUUU (Mercury and Air Toxics Standards - MATS) to document quarterly HCl stack emissions. The testing was conducted on August 8, 2018.

The fieldwork was performed in accordance with EPA Reference Methods and DTE Energy Intent to Test¹, which was approved in a letter by Mr. Tom Maza from the Michigan Department of Environmental Quality (MDEQ), dated January 20, 2017². The following DTE Energy personnel participated in the testing program: Mr. Jason Logan, Environmental Specialist, Mr. Mark Westerberg, Senior Environmental Specialist, and Mr. Fred Meineke, Senior Environmental Technician. Mr. Logan was the project leader. Ms. Tanecia Wilson, Associate Environmental Engineer at the plant, provided process coordination for the testing program.

2.0 SOURCE DESCRIPTION

The River Rouge Power Plant (RRPP), located at 1 Belanger Park Dr. River Rouge, Michigan, employs the use of one coal-fired boiler. Unit 3 is a Foster-Wheeler Boiler, nominally rated at 278 GMW. Particulate emissions from Unit 3 are controlled via a Wheelabrator-Fry electrostatic precipitator (ESP). The air pollution control equipment has a designed collection efficiency of 99.9%.

The boiler is equipped with a Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI) air quality control system. The DSI system is used to control acid gas, PM, PM10, PM2.5, and NOx emissions from the unit. Trona is received at the plant where inline mills further refine the Trona. The ACI system is used to control Mercury emissions.

Testing was performed on Unit 3 while operating at normal load conditions, per Subpart UUUUU.

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* or listed as an approved

¹ MDEQ, Test Plan, Submitted October 23, 2017. (Attached-Appendix A)

² MDEQ, Approval Letter, dated January 20, 2017. (Attached-Appendix A)



“Other Test Method”. The sampling and analytical methods used in the testing program are indicated in the table below:

Sampling Method	Parameter	Analysis
USEPA Method 3A	Oxygen & CO ₂	Instrumental Analyzer Method
USEPA Method 4	Moisture Content	Field data analysis and reduction
USEPA Method 26a	Hydrogen Chloride	Ion Chromatography
USEPA Method 19	Emission Rate Calculations	Stoichiometric Calculations

3.1 OXYGEN AND CARBON DIOXIDE (USEPA Method 3A)

3.1.1 Sampling Method

Stack gas 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 O₂ / CO₂ analyzers utilize paramagnetic sensors.

3.1.2 O₂ / CO₂ Sampling Train

The Method 3A sampling system consisted of continuously collecting a gas sample from the exhaust of the dry gas meter sampling system. The samples were drawn through a PTFE line into a Servomex™ O₂/CO₂ gas analyzer.

3.1.3 Sampling Train Calibration

The O₂ / CO₂ analyzer was calibrated per procedures outlined in USEPA Method 7E. Zero, span, and mid-range calibration gases were introduced directly into the analyzer to verify the instruments linearity. The O₂/CO₂ concentrations are recorded on the field data sheets.

3.2 MOISTURE DETERMINATION (USEPA Method 4)

3.2.1 Sampling Method

Determination of the moisture content of the exhaust gas was performed using the method described in USEPA Method 4, “Determination of Moisture Content in Stack Gases”. The exhaust gas condensate was collected in glass impingers and the



percentage of moisture was derived from calculations outlined in USEPA Method 4 as a component of the HCl sampling train.

3.3 HYDROGEN CHLORIDE (USEPA Method 26A)

3.3.1 HCl Sampling Method

USEPA Method 26A, "Determination of Hydrogen Halide and Halogen Emissions" (Method 26A) was used to measure the Hydrochloric Acid (HCl) emissions (see Figure 2 for a schematic of the sampling train). Method 26A uses impingers containing 0.1N H₂SO₄ to capture the HCl. Triplicate, 60-minute test runs were conducted. The Method 26A sampling was performed as a single point sample per Method 26 procedures.

The Method 26A stack sampling system (Figure 2) consisted of the following:

- (1) Heated glass-lined probe (Maintained >250 °F)
- (2) Heated 3" glass filter holder with a PTFE filter (maintained at a temperature of >250 °F)
- (3) Set of impingers for the collection HCl and condensate for moisture determination (Impingers containing 0.1N H₂SO₄)
- (4) Length of sample line
- (5) Environmental Supply[®] control case equipped with a pump, dry gas meter, and calibrated orifice.

All sampling was conducted at a single point per Method 26.

After completion of each run, a leak test was conducted. All the impingers were measured for moisture gain. The contents of impingers 1 and 2 were collected in a designated sample container. Impingers 1 and 2 were then rinsed with DI water and collected in the same sample container. Each 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.

Collected field blanks consisted of a 0.1N H₂SO₄ solution blank. 200ml of 0.1N H₂SO₄ was collected and diluted with DI water, from the same bottle used in sample recovery, to the liquid level of the three test runs. The blank was collected and analyzed following the same procedures used to recover and analyze the field samples.



Analysis of the Method 26A samples and blanks were conducted by Maxxaam Analytics. All analysis followed the procedures listed in USEPA Method 26A. A complete laboratory report is in Appendix E.

Field data sheets for the Method 26A sampling are in Appendix B.

3.3.2 Quality Control and Assurance

All sampling and analytical equipment was calibrated per the guidelines referenced in EPA Method 5 and 26A.

3.3.3 Data Reduction

The HCl emissions data collected during the testing were calculated and reported as parts per million (ppm) and pounds per million Btu (lb/MMBtu).

Analysis of the Method 26A samples and blanks were conducted by Maxxaam Analytics. All analyses followed the procedures listed in USEPA Method 26A. A complete laboratory report is in Appendix E.

Field data sheets for the Method 26A sampling are in Appendix B.

4.0 OPERATING PARAMETERS

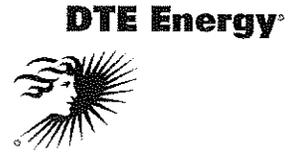
The test program included the collection of boiler load and stack emissions CEMs data during each test run. Parameters recorded included gross Megawatts (GMW) and CEMs data (SO₂, NO_x, CO₂, and opacity). Additionally, dry sorbent injection rates (DSI) and activated carbon injection rates (ACI), in pounds per hour (lb/hr), are reported. Operational Data collected during the testing is presented in Appendix C.

During each day of emissions sampling, a representative coal sample was collected from the unit and analyzed for ultimate and proximate analysis, including % Sulfur, % Ash, and heat content. The results of the coal analysis was used to calculate an Fc value for each day of testing and used in the lb/MMBtu calculations. Results of the fuel analysis can be referred to in Appendix E.

HCl emissions testing was performed at maximum normal operating load and representative of site specific normal operating conditions according to 40 CFR part 63.10007.

5.0 DISCUSSION OF RESULTS

Table 1 presents the HCl emission testing results from Unit 3. HCl emissions are presented in parts per million on a wet basis (ppm_w) and pounds per million BTU (lbs/MMBtu). Unit 3 demonstrated average HCl emissions below the Subpart UUUUU limit of 0.002 lb/MMBtu.



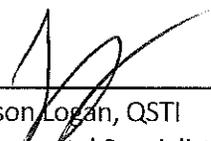
The auxiliary test data presented in the results table for each test includes the unit load in gross megawatts (GMW), DSI injection rate (lb/hr), ACI injection rate (lb/hr), and CO₂ concentration (%_{wet}).

6.0 CERTIFICATION STATEMENT

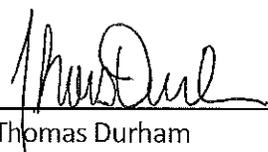
“I certify that I believe the information provided in this document is true, accurate, and complete. Results of testing are based on the good faith application of sound professional judgment, using techniques, factors, or standards approved by the Local, State, or Federal Governing body, or generally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



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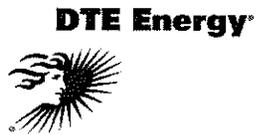


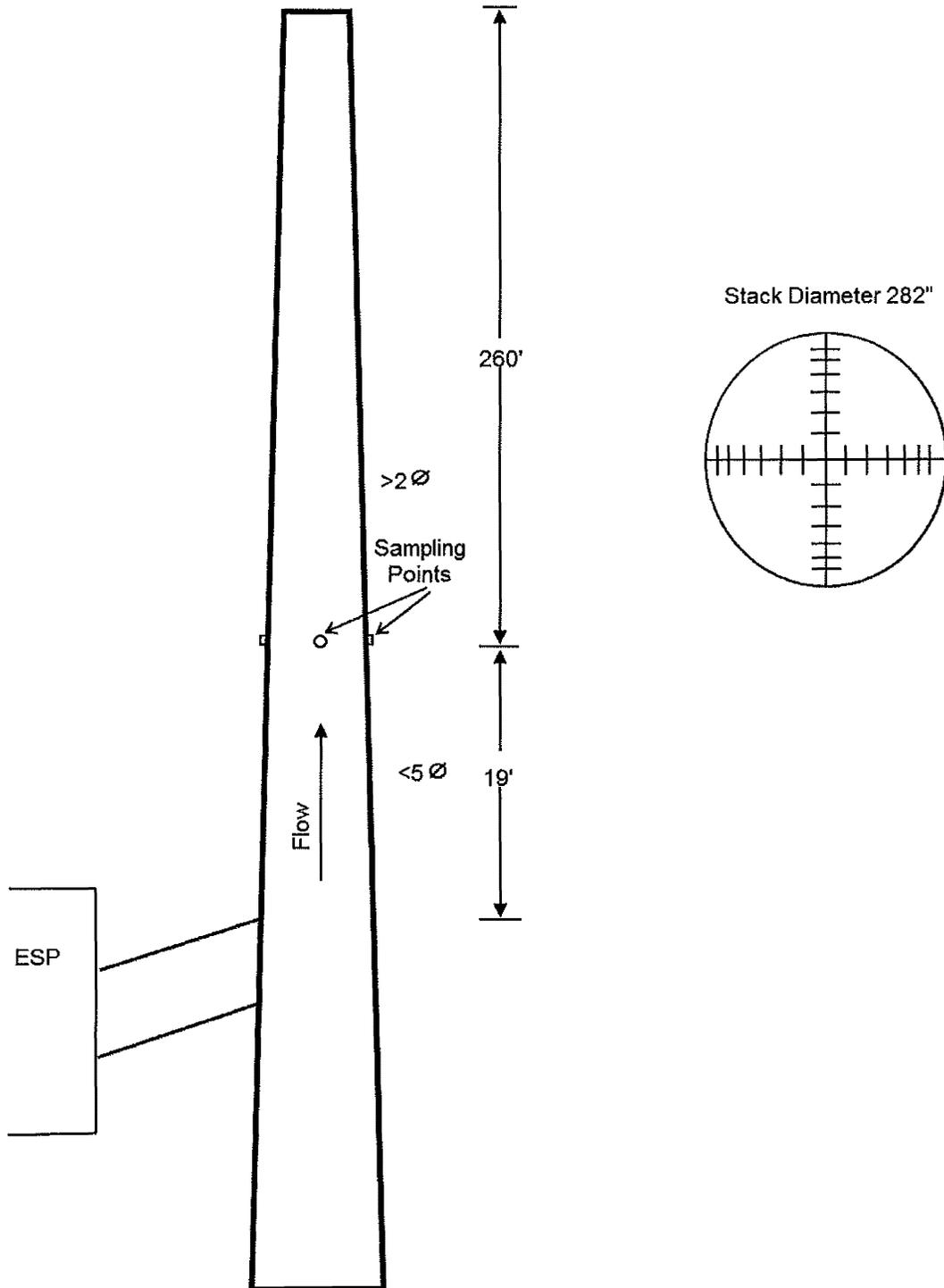
TABLE NO. 1
HYDROGEN CHLORIDE EMISSIONS TESTING RESULTS
 River Rouge Power Plant - Unit 3
 August 8, 2018

Test	Test Date	Test Time	Unit Load (GMW)	DSI Injection Rate (lb/hr)	ACI Injection Rate (lb/hr)	CO ₂ Concentration (%)	HCl Concentration (ppmv)	HCl Emissions (lbs/MMBtu) ⁽¹⁾
HCl-1	8-Aug-18	07:27-08:28	230.5	833	70	12.5	0.48	0.0007
HCl-2		08:45-09:45	230.3	833	70	12.6	0.35	0.0005
HCl-3		09:57-10:57	<u>230.3</u>	<u>833</u>	<u>70</u>	<u>12.8</u>	<u>0.36</u>	<u>0.0005</u>
Average:			230.4	833	70	12.6	0.40	0.0006

(1) MATS Limit = 0.002 lb/MMBtu



Figure 1 – Sampling Location
River Rouge Power Plant – Unit 3
August 8, 2018



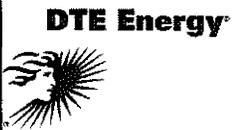


Figure 2 – USEPA Method 26A (Modified)
St. Clair Power Plant
August 8, 2018

