



## 1. INTRODUCTION

This report presents the results of the source emissions testing conducted by Environmental Quality Management, Inc. (EQM) for TC Energy's ANR Pipeline (ANR) Woolfolk Compressor, near Big Rapids, MI, which is located in Mecosta County. The primary purpose of this testing program was to conduct emissions testing to determine compliance with flexible groups FG-RICE-818-WLENGINES and RICE MACT in the permit and are subject to 40 CFR Part 63, Subpart ZZZZ requirement specified in Permit MI-ROP-B7220-2017a for the Units EUWL001 (Unit 1), EUWL002 (Unit 2), EUWL003 (Unit 3), EUWL004 (Unit 4), EUWL005 (Unit 5), EUWL007 (Unit 7), EUWL008 (Unit 8), and EUWL009 (Unit 9) Engines at ANR's gas compressor facility.

To ensure that compliance with the emission limits is maintained, the Air Compliance Team of TC Energy's ANR contracted Environmental Quality Management, Inc. (EQM) to perform source emissions testing on the eight units. The primary purpose of this testing program was to conduct emissions testing to determine compliance with the permit at ANR's gas compressor facility.

EQM's responsibility was to conduct and oversee the compliance testing for the NO<sub>x</sub> and Formaldehyde (H<sub>2</sub>CO) emission rates and perform data reduction for conformance evaluation. ANR's responsibility was to maintain process operating parameters and to assist in providing process operating data per compliance test requirements. EQM contracted the services of Prism Analytical Technologies out of Mount Pleasant, MI for the Method 320.

The following report provides information pertaining to TC Energy's process operations, and Compliance testing. The Compliance testing conducted on Unit 1 and Unit 2 was performed on July 20, 2021 from 10:40 A.M.-5:17 P.M. The Compliance testing conducted on Unit 3 and Unit 4 was performed on July 21, 2021 from 9:02 A.M.-5:16 P.M. The Compliance testing conducted on Unit 5 and Unit 7 was performed on July 22, 2021 from 10:42 A.M.-5:57 P.M. The Compliance testing conducted on Unit 8 and Unit 9 was performed on July 23, 2021 from 8:27 A.M.-4:08 P.M.

The following requirements were specific for the testing program:

1. Equipment calibrations performed and calibration data provided.
2. Three (3) sixty (60) –minute NO<sub>x</sub>, H<sub>2</sub>CO and O<sub>2</sub>, test runs performed at the eight Units pursuant to EPA, Title 40, Code of Federal Regulations, Part 60 (40 CFR 60), Appendix A.
3. Process operations conditions maintained within 10% rated load during the emissions testing periods.
4. All testing and analyses performed in accordance with current EPA test methodologies and analytical procedures for H<sub>2</sub>CO and O<sub>2</sub> emissions



- determinations via Extractive Fourier transform infrared (FTIR) spectrometry.
5. All testing and analyses performed in accordance with current EPA test methodologies and analytical procedures for O<sub>2</sub> to quantify the concentration levels from each source to correct formaldehyde concentrations for oxygen content.
  6. All testing and analyses performed in accordance with current EPA test methodologies and analytical procedures for NO<sub>x</sub>, and O<sub>2</sub> test runs performed at the eight engines pursuant to EPA Reference methods as described in 40 CFR, Part 60, Appendix A
  6. Stratification was found to be less than 3% in the turbine exhaust.

The testing program was approved by and/or coordinated with Tyrah Lydia, TC Energy's ANR Pipeline. The emission testing was performed by Karl Mast, Project Manager, EQM and Cody Shifflett, Prism Analytical Technologies. The emission testing was observed by Lindsey Wells, Michigan EGLE.



## 2. TEST RESULTS SUMMARY

The compliance testing was performed on Units 1, 2, 3, 4, 5, 7, 8, and 9 systems in accordance with the requirements of the Code of Federal Regulations, Title 40, Part 60, Appendix A, and the Permit MI-ROP-B7220-2017a requirements. A summary of the test results is given below:

<b>Table 1. H<sub>2</sub>CO % Destruction Efficiency</b>					
<b>Unit</b>	<b>Run 1</b>	<b>Run 2</b>	<b>Run 3</b>	<b>Average</b>	<b>Limit</b>
EUWL001	89.98	87.60	86.74	88.11	76%
EUWL002	86.49	86.59	87.10	86.73	76%
EUWL003	89.58	89.29	89.84	89.57	76%
EUWL004	91.08	90.63	90.63	90.78	76%
EUWL005	93.58	93.19	92.71	93.16	76%
EUWL007	91.08	90.22	90.88	90.73	76%
EUWL008	92.72	91.73	91.43	91.96	76%
EUWL009	91.27	91.46	91.29	91.34	76%



<b>Table 2. NO<sub>x</sub> Emission Results Lb/Hr</b>					
<b>Unit</b>	<b>Run 1</b>	<b>Run 2</b>	<b>Run 3</b>	<b>Average</b>	<b>Limit</b>
EUWL001	9.05	9.70	9.50	9.41	45.19
EUWL002	18.44	20.88	18.87	19.40	45.19
EUWL003	15.86	18.17	17.75	17.26	45.19
EUWL004	34.58	35.26	33.67	34.51	45.19
EUWL005	18.01	18.77	20.15	18.98	45.19
EUWL007	13.09	13.55	12.02	12.89	59.66
EUWL008	10.73	11.78	12.07	11.53	59.66
EUWL009	32.11	34.54	33.59	33.42	59.66



<b>Table 3. NO<sub>x</sub> Emission Results gr/bhp/hr</b>					
<b>Unit</b>	<b>Run 1</b>	<b>Run 2</b>	<b>Run 3</b>	<b>Average</b>	<b>Limit</b>
EUWL001	4.23	4.53	4.52	4.42	20.5
EUWL002	9.11	9.69	8.91	9.23	20.5
EUWL003	7.52	8.55	8.46	8.18	20.5
EUWL004	16.06	16.82	16.11	16.33	20.5
EUWL005	9.02	9.12	9.80	9.32	20.5
EUWL007	4.67	4.95	4.29	4.63	20.5
EUWL008	3.87	4.21	4.29	4.12	20.5
EUWL009	11.93	12.76	12.21	12.32	20.5

Based on the information provided above, all eight units met the acceptance criteria during the course of the testing. A complete list of performance parameters for each test run that was performed at the stack sampling locations can be found in Tables 4-19.



**Table 4 . Engine Operating and Ambient Conditions -Unit EUWL001**

Run	1	2	3	
Date	07/20/21	07/20/21	07/20/21	
Time	9:40	11:08	12:21	
<b>Engine Operating Conditions</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>Averages</b>
Unit Horsepower from Control Panel	971.0	972.0	954.0	965.7
Unit Speed (rpm)	331.0	329.0	328.0	329.3
Compressor Suction Pressure (PSIG)	503.0	508.0	518.0	509.7
Compressor Suction Temperature (°F)	66.2	67.1	68.3	67.2
Compressor Discharge Pressure (PSIG)	781.0	785.0	787.0	784.3
Compressor Flow (MMSCF/D)	42.2	42.7	43.5	42.8
% Load	97.1	97.2	95.4	96.6
% Torque	96.8	97.5	96.0	96.8
Heat Rate (BTU/HP-hr)	8,323.5	8,305.0	8,411.2	8,346.6
<b>Ambient Conditions</b>				
Ambient Temperature (°F)	72.00	75.00	79.00	75.33
Barometric Pressure (psi)	14.23	14.22	14.22	14.22
Ambient Relative Humidity (%)	76.00	68.00	63.00	69.00
Absolute Humidity (grains/LB)	192.44	190.42	201.90	194.92



**Table 5. Emissions Concentrations, Calculated  
Mass Emissions, Concentrations & Flows -Unit EUWL001**

Run	1	2	3	
Date	07/20/21	07/20/21	07/20/21	
Time	9:40	11:08	12:21	
<b>Emissions Concentrations &amp; Calculated Mass Emissions</b>				
NO <sub>x</sub> ppm (BIAS Corrected)	667.92	717.15	703.98	696.35
NO <sub>x</sub> g/BHP-HR	4.23	4.53	4.52	4.42
NO <sub>x</sub> LB/HR	9.05	9.70	9.50	9.41
NO <sub>x</sub> (ppm @ 15% O <sub>2</sub> )	274.89	295.05	290.69	286.88
NO <sub>x</sub> LB/MMBTU	1.01	1.09	1.07	1.06
NO <sub>x</sub> Tons/Year	39.62	42.48	41.60	41.23
H <sub>2</sub> CO Inlet ppmw	12.41	12.05	12.34	12.27
H <sub>2</sub> CO Inlet (ppmw @ 15% O <sub>2</sub> )	4.67	4.53	4.65	4.62
H <sub>2</sub> CO Outlet ppmw	1.1700	1.41	1.47	1.35
H <sub>2</sub> CO Outlet (ppmw @ 15% O <sub>2</sub> )	0.47	0.56	0.62	0.55
H <sub>2</sub> CO % Removal Limit is 76%	89.98	87.60	86.73	88.10
H <sub>2</sub> O ppm (% FTIR)	13.36	14.42	14.31	14.03
% O <sub>2</sub> Inlet (raw measured wet)	5.23	5.20	5.23	5.22
% O <sub>2</sub> Outlet (raw measured wet)	6.16	6.09	6.83	6.36
% O <sub>2</sub> (BIAS Corrected Dry)	6.56	6.56	6.61	6.58
<b>Calculated Flows</b>				
Fuel Flow - (SCFM)	139.67	139.50	138.67	139.28
Fuel Flow - (SCFH)	8,380	8,370	8,320	8,357
Exhaust Flow (LB/HR)	7,981.2	7,956.4	7,932.5	7,957
Exhaust Flow (WSCFM)	2,073.0	2,063.3	2,130.7	2,089
Air Flow (WSCFM)	1,829	1,826	1,822	1,825
Exhaust Flow Method 19 (scfm)	1,887	1,884	1,879	1,883
Exhaust Flow Method 19 (lbm/min)	88	88	88	88
Exhaust Flow Carbon Balance (lbm/min)	152.34	152.11	151.72	152
Air flow Beshouri (scfin)	1,982.08	1,979.09	1,973.89	1,978
<b>Fuel Flow Measurements</b>				
Fuel Flow From Screen(MSCFH)	8.38	8.37	8.32	8.36
<b>** BASED ON FUEL SPECIFIC DRY F-FACTOR CALCULATION</b>	Run 1	Run 2	Run 3	
<b>* BASED ON CARBON BALANCE (STOICH. + O<sub>2</sub>)</b>				
<b>- A / F IS TOTAL MASS RATIO</b>				



**Table 6 . Engine Operating and Ambient Conditions -Unit EUWL002**

Run	1	2	3	
Date	07/20/21	07/20/21	07/20/21	
Time	14:26	15:44	16:57	
<b>Engine Operating Conditions</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>Averages</b>
Unit Horsepower from Control Panel	918.0	978.0	961.0	952.3
Unit Speed (rpm)	329.0	331.0	333.0	331.0
Compressor Suction Pressure (PSIG)	540.0	513.0	522.0	525.0
Compressor Suction Temperature (°F)	70.1	68.7	68.5	69.1
Compressor Discharge Pressure (PSIG)	788.0	788.0	787.0	787.7
Compressor Flow (MMSCF/D)	45.4	43.1	44.3	44.3
% Load	91.8	97.8	96.1	95.2
% Torque	92.1	97.5	95.2	94.9
Heat Rate (BTU/HP-hr)	8,615.0	8,441.5	8,450.3	8,502.2
<b>Ambient Conditions</b>				
Ambient Temperature (°F)	81.00	79.00	77.00	79.00
Barometric Pressure (psi)	14.21	14.21	14.22	14.21
Ambient Relative Humidity (%)	59.00	59.00	62.00	60.00
Absolute Humidity (grains/LB)	201.97	188.68	185.43	192.03



**Table 7. Emissions Concentrations, Calculated  
Mass Emissions, Concentrations & Flows -Unit EUWL002**

Run	1	2	3	
Date	07/20/21	07/20/21	07/20/21	
Time	14:26	15:44	16:57	
<b>Emissions Concentrations &amp; Calculated Mass Emissions</b>				
NO <sub>x</sub> ppm (BIAS Corrected)	1460.12	1589.85	1456.72	1502.23
NO <sub>x</sub> g/BHP-HR	9.11	9.69	8.91	9.23
NO <sub>x</sub> LB/HR	18.44	20.88	18.87	19.40
NO <sub>x</sub> (ppm @ 15% O <sub>2</sub> )	572.55	621.21	570.60	588.12
NO <sub>x</sub> LB/MMBTU	2.11	2.29	2.10	2.17
NO <sub>x</sub> Tons/Year	80.76	91.47	82.64	84.96
H <sub>2</sub> CO Inlet ppmw	11.83	12.00	11.70	11.84
H <sub>2</sub> CO Inlet (ppmw @ 15% O <sub>2</sub> )	4.20	4.28	4.18	4.22
H <sub>2</sub> CO Outlet ppmw	1.48	1.58	1.43	1.50
H <sub>2</sub> CO Outlet (ppmw @ 15% O <sub>2</sub> )	0.57	0.57	0.54	0.56
H <sub>2</sub> CO % Removal Limit is 76%	86.49	86.59	87.10	86.73
H <sub>2</sub> O ppm (% FTIR)	15.56	16.28	15.59	15.81
% O <sub>2</sub> Inlet (raw measured wet)	4.30	4.36	4.40	4.35
% O <sub>2</sub> Outlet (raw measured wet)	5.53	4.66	5.27	5.15
% O <sub>2</sub> (BIAS Corrected Dry)	5.85	5.80	5.84	5.83
<b>Calculated Flows</b>				
Fuel Flow - (SCFM)	136.67	142.67	140.33	139.89
Fuel Flow - (SCFH)	8,200	8,560	8,420	8,393
Exhaust Flow (LB/HR)	7,471.1	7,769.2	7,670.7	7,637
Exhaust Flow (WSCFM)	1,957.2	1,962.6	1,985.1	1,968
Air Flow (WSCFM)	1,705	1,774	1,749	1,743
Exhaust Flow Method 19 (scfm)	1,759	1,830	1,804	1,798
Exhaust Flow Method 19 (lbm/min)	82	85	84	84
Exhaust Flow Carbon Balance (lbm/min)	142.57	148.34	146.25	146
Air flow Beshouri (scfm)	1,854.85	1,929.97	1,902.74	1,896
<b>Fuel Flow Measurements</b>				
Fuel Flow From Screen(MSCFH)	8.20	8.56	8.42	8.39
<b>** BASED ON FUEL SPECIFIC DRY F-FACTOR CALCULATION</b>	Run 1	Run 2	Run 3	
<b>* BASED ON CARBON BALANCE (STOICH. + O<sub>2</sub>)</b>				
<b>- A/F IS TOTAL MASS RATIO</b>				



**Table 8 . Engine Operating and Ambient Conditions -Unit EUWL003**

Run	1	2	3	
Date	07/21/21	07/21/21	07/21/21	
Time	9:02	10:18	11:30	
<b>Engine Operating Conditions</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>Averages</b>
Unit Horsepower from Control Panel	957.0	964.0	952.0	957.7
Unit Speed (rpm)	333.0	334.0	329.0	332.0
Compressor Suction Pressure (PSIG)	531.0	527.0	525.0	527.7
Compressor Suction Temperature (°F)	56.1	56.1	56.1	56.1
Compressor Discharge Pressure (PSIG)	793.0	788.0	790.0	790.3
Compressor Flow (MMSCF/D)	46.6	46.4	45.7	46.2
% Load	95.7	96.4	95.2	95.8
% Torque	94.8	95.2	95.5	95.2
Heat Rate (BTU/HP-hr)	8,738.6	8,775.4	8,794.7	8,769.6
<b>Ambient Conditions</b>				
Ambient Temperature (°F)	64.00	67.00	68.00	66.33
Barometric Pressure (psi)	14.29	14.30	14.30	14.30
Ambient Relative Humidity (%)	76.00	59.00	56.00	63.67
Absolute Humidity (grains/LB)	144.00	123.42	121.19	129.54



**Table 9. Emissions Concentrations, Calculated  
Mass Emissions, Concentrations & Flows -Unit EUWL003**

Run	1	2	3	
Date	07/21/21	07/21/21	07/21/21	
Time	9:02	10:18	11:30	
<b>Emissions Concentrations &amp; Calculated Mass Emissions</b>				
NO <sub>x</sub> ppm (BIAS Corrected)	1151.74	1306.51	1290.00	1249.42
NO <sub>x</sub> g/BHP-HR	7.52	8.55	8.46	8.18
NO <sub>x</sub> LB/HR	15.86	18.17	17.75	17.26
NO <sub>x</sub> (ppm @ 15% O <sub>2</sub> )	465.91	527.55	520.79	504.75
NO <sub>x</sub> LB/MMBTU	1.72	1.94	1.92	1.86
NO <sub>x</sub> Tons/Year	69.49	79.59	77.76	75.61
H <sub>2</sub> CO Inlet ppmw	10.02	9.87	9.90	9.93
H <sub>2</sub> CO Inlet (ppmw @ 15% O <sub>2</sub> )	3.60	3.59	3.61	3.60
H <sub>2</sub> CO Outlet ppmw	0.9520	1.00	0.96	0.97
H <sub>2</sub> CO Outlet (ppmw @ 15% O <sub>2</sub> )	0.38	0.38	0.37	0.38
H <sub>2</sub> CO % Removal Limit is 76%	89.58	89.29	89.84	89.57
H <sub>2</sub> O ppm (% FTIR)	14.40	14.90	14.25	14.52
% O <sub>2</sub> Inlet (raw measured wet)	4.50	4.66	4.70	4.62
% O <sub>2</sub> Outlet (raw measured wet)	5.94	5.54	5.50	5.66
% O <sub>2</sub> (BIAS Corrected Dry)	6.32	6.29	6.29	6.30
<b>Calculated Flows</b>				
Fuel Flow - (SCFM)	144.33	146.00	144.50	144.94
Fuel Flow - (SCFH)	8,660	8,760	8,670	8,697
Exhaust Flow (LB/HR)	8,159.6	8,215.2	8,125.0	8,167
Exhaust Flow (WVSCFM)	2,117.8	2,101.2	2,075.7	2,098
Air Flow (WVSCFM)	1,860	1,878	1,859	1,866
Exhaust Flow Method 19 (scfm)	1,919	1,937	1,917	1,925
Exhaust Flow Method 19 (lbm/min)	89	90	89	89
Exhaust Flow Carbon Balance (lbm/min)	155.13	156.66	155.02	156
Air flow Beshouri (scfm)	2,018.32	2,038.18	2,016.90	2,024
<b>Fuel Flow Measurements</b>				
Fuel Flow From Screen(MSCFH)	8.66	8.76	8.67	8.70
<b>** BASED ON FUEL SPECIFIC DRY F-FACTOR CALCULATION</b>	Run 1	Run 2	Run 3	
<b>* BASED ON CARBON BALANCE (STOICH. + O<sub>2</sub>)</b>				
<b>- A/F IS TOTAL MASS RATIO</b>				



**Table 10 . Engine Operating and Ambient Conditions -Unit EUWL004**

Run	1	2	3	
Date	07/21/21	07/21/21	07/21/21	
Time	14:20	15:33	16:56	
<b>Engine Operating Conditions</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>Averages</b>
Unit Horsepower from Control Panel	977.0	951.0	948.0	958.7
Unit Speed (rpm)	330.0	330.0	328.0	329.3
Compressor Suction Pressure (PSIG)	518.0	532.0	536.0	528.7
Compressor Suction Temperature (°F)	58.2	59.3	59.5	59.0
Compressor Discharge Pressure (PSIG)	791.0	794.0	797.0	794.0
Compressor Flow (MMSCF/D)	44.8	46.0	46.2	45.7
% Load	97.7	95.1	94.8	95.9
% Torque	97.7	95.1	95.4	96.1
Heat Rate (BTU/HP-hr)	9,192.3	9,321.8	9,330.9	9,281.7
<b>Ambient Conditions</b>				
Ambient Temperature (°F)	72.00	73.00	73.00	72.67
Barometric Pressure (psi)	14.29	14.29	14.29	14.29
Ambient Relative Humidity (%)	42.00	41.00	40.00	41.00
Absolute Humidity (grains/LB)	103.80	104.86	102.27	103.65



**Table 11. Emissions Concentrations, Calculated  
Mass Emissions, Concentrations & Flows -Unit EUWL004**

Run	1	2	3	
Date	07/21/21	07/21/21	07/21/21	
Time	14:20	15:33	16:56	
<b>Emissions Concentrations &amp; Calculated Mass Emissions</b>				
NO <sub>x</sub> ppm (BIAS Corrected)	2722.07	2818.50	2692.03	2744.20
NO <sub>x</sub> g/BHP-HR	16.06	16.82	16.11	16.33
NO <sub>x</sub> LB/HR	34.58	35.26	33.67	34.51
NO <sub>x</sub> (ppm @ 15% O <sub>2</sub> )	945.70	976.86	934.95	952.51
NO <sub>x</sub> LB/MMBTU	3.48	3.60	3.44	3.51
NO <sub>x</sub> Tons/Year	151.47	154.44	147.49	151.13
H <sub>2</sub> CO Inlet ppmw	10.62	10.08	10.41	10.37
H <sub>2</sub> CO Inlet (ppmw @ 15% O <sub>2</sub> )	3.29	3.10	3.23	3.21
H <sub>2</sub> CO Outlet ppmw	0.85	0.89	0.89	0.88
H <sub>2</sub> CO Outlet (ppmw @ 15% O <sub>2</sub> )	0.29	0.29	0.30	0.30
H <sub>2</sub> CO % Removal Limit is 76%	91.08	90.63	90.63	90.78
H <sub>2</sub> O ppm (% FTIR)	16.41	17.17	16.41	16.66
% O <sub>2</sub> Inlet (raw measured wet)	1.86	1.75	1.87	1.83
% O <sub>2</sub> Outlet (raw measured wet)	3.77	2.76	3.63	3.39
% O <sub>2</sub> (BIAS Corrected Dry)	3.92	3.88	3.91	3.90
<b>Calculated Flows</b>				
Fuel Flow - (SCFM)	155.00	153.00	152.67	153.56
Fuel Flow - (SCFH)	9,300	9,180	9,160	9,213
Exhaust Flow (LB/HR)	7,665.5	7,542.4	7,544.6	7,584
Exhaust Flow (WVSCFM)	2,027.6	1,920.9	1,985.4	1,978
Air Flow (WVSCFM)	1,717	1,691	1,691	1,700
Exhaust Flow Method 19 (scfm)	1,770	1,743	1,743	1,752
Exhaust Flow Method 19 (lbm/min)	82	81	81	81
Exhaust Flow Carbon Balance (lbm/min)	144.88	142.70	142.65	143
Air flow Beshouri (scfm)	1,884.95	1,856.57	1,856.01	1,866
<b>Fuel Flow Measurements</b>				
Fuel Flow From Screen(MSCFH)	9.30	9.18	9.16	9.21
<b>** BASED ON FUEL SPECIFIC DRY F-FACTOR CALCULATION</b>	Run 1	Run 2	Run 3	
<b>* BASED ON CARBON BALANCE (STOICH. + O<sub>2</sub>)</b>				
<b>- A/F IS TOTAL MASS RATIO</b>				



**Table 12 . Engine Operating and Ambient Conditions Flows -Unit EUWL005**

Run	1	2	3	
Date	07/22/21	07/22/21	07/22/21	
Time	10:42	11:55	13:07	
<b>Engine Operating Conditions</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>Averages</b>
Unit Horsepower from Control Panel	905.0	933.0	933.0	923.7
Unit Speed (rpm)	318.0	323.0	323.0	321.3
Compressor Suction Pressure (PSIG)	498.0	471.0	471.0	480.0
Compressor Suction Temperature (°F)	57.9	58.6	58.6	58.4
Compressor Discharge Pressure (PSIG)	767.0	749.0	749.0	755.0
Compressor Flow (MMSCF/D)	40.9	39.3	39.3	39.8
% Load	90.5	93.3	93.3	92.4
% Torque	93.9	95.3	95.3	94.9
Heat Rate (BTU/HP-hr)	8,677.4	8,623.3	8,623.3	8,641.3
<b>Ambient Conditions</b>				
Ambient Temperature (°F)	68.00	73.00	73.00	71.33
Barometric Pressure (psi)	14.32	14.31	14.31	14.32
Ambient Relative Humidity (%)	57.00	51.00	51.00	53.00
Absolute Humidity (grains/LB)	123.22	130.99	130.99	128.40



**Table 13. Emissions Concentrations, Calculated  
Mass Emissions, Concentrations & Flows -Unit EUWL005**

Run	1	2	3	
Date	07/22/21	07/22/21	07/22/21	
Time	10:42	11:55	13:07	
<b>Emissions Concentrations &amp; Calculated Mass Emissions</b>				
NO <sub>x</sub> ppm (BIAS Corrected)	1412.28	1435.51	1547.05	1464.95
NO <sub>x</sub> g/BHP-HR	9.02	9.12	9.80	9.32
NO <sub>x</sub> LB/HR	18.01	18.77	20.15	18.98
NO <sub>x</sub> (ppm @ 15% O <sub>2</sub> )	563.03	572.80	615.16	583.66
NO <sub>x</sub> LB/MMBTU	2.07	2.11	2.27	2.15
NO <sub>x</sub> Tons/Year	78.86	82.20	88.28	83.11
H <sub>2</sub> CO Inlet ppmw	11.20	11.11	11.10	11.14
H <sub>2</sub> CO Inlet (ppmw @ 15% O <sub>2</sub> )	4.05	4.02	4.02	4.03
H <sub>2</sub> CO Outlet ppmw	0.67	0.69	0.78	0.71
H <sub>2</sub> CO Outlet (ppmw @ 15% O <sub>2</sub> )	0.26	0.27	0.29	0.28
H <sub>2</sub> CO % Removal Limit is 76%	93.58	93.19	92.71	93.16
H <sub>2</sub> O ppm (% FTIR)	14.56	14.38	15.23	14.72
% O <sub>2</sub> Inlet (raw measured wet)	4.60	4.60	4.60	4.60
% O <sub>2</sub> Outlet (raw measured wet)	5.75	5.95	5.15	5.62
% O <sub>2</sub> (BIAS Corrected Dry)	6.10	6.11	6.06	6.09
<b>Calculated Flows</b>				
Fuel Flow - (SCFM)	136.00	139.33	139.33	138.22
Fuel Flow - (SCFH)	8,160	8,360	8,360	8,293
Exhaust Flow (LB/HR)	7,548.7	7,730.7	7,697.0	7,659
Exhaust Flow (WSCFM)	1,967.7	2,035.8	1,959.1	1,988
Air Flow (WSCFM)	1,722	1,765	1,759	1,749
Exhaust Flow Method 19 (scfm)	1,776	1,821	1,815	1,804
Exhaust Flow Method 19 (lbm/min)	82	84	84	84
Exhaust Flow Carbon Balance (lbm/min)	143.76	147.41	146.94	146
Air flow Beshouri (scfm)	1,870.47	1,917.86	1,911.72	1,900
<b>Fuel Flow Measurements</b>				
Fuel Flow From Screen(MSCFH)	8.16	8.36	8.36	8.29
<b>** BASED ON FUEL SPECIFIC DRY F-FACTOR CALCULATION</b>	Run 1	Run 2	Run 3	
<b>* BASED ON CARBON BALANCE (STOICH. + O<sub>2</sub>)</b>				
<b>- A / F IS TOTAL MASS RATIO</b>				



**Table 14 . Engine Operating and Ambient Conditions -Unit EUWL007**

Run	1	2	3	
Date	07/22/21	07/22/21	07/22/21	
Time	15:00	16:24	17:37	
<b>Engine Operating Conditions</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>Averages</b>
Unit Horsepower from Control Panel	1,272.0	1,243.0	1,271.0	1,262.0
Unit Speed (rpm)	332.0	331.0	327.0	330.0
Compressor Suction Pressure (PSIG)	480.0	477.0	468.0	475.0
Compressor Suction Temperature (°F)	55.5	54.3	54.3	54.7
Compressor Discharge Pressure (PSIG)	738.0	736.0	733.0	735.7
Compressor Flow (MMSCF/D)	57.0	56.2	55.4	56.2
% Load	96.4	94.2	96.3	95.6
% Torque	95.8	93.9	97.2	95.6
Heat Rate (BTU/HP-hr)	8,761.3	8,911.5	8,881.8	8,851.6
<b>Ambient Conditions</b>				
Ambient Temperature (°F)	76.00	75.00	77.00	76.00
Barometric Pressure (psi)	14.30	14.30	14.30	14.30
Ambient Relative Humidity (%)	51.00	52.00	49.00	50.67
Absolute Humidity (grains/LB)	145.36	143.31	144.35	144.34



**Table 15. Emissions Concentrations, Calculated  
Mass Emissions, Concentrations & Flows -Unit EUWL007**

Run	1	2	3	
Date	07/22/21	07/22/21	07/22/21	
Time	15:00	16:24	17:37	
<b>Emissions Concentrations &amp; Calculated Mass Emissions</b>				
NO <sub>x</sub> ppm (BIAS Corrected)	717.80	749.80	649.99	705.86
NO <sub>x</sub> g/BHP-HR	4.67	4.95	4.29	4.63
NO <sub>x</sub> LB/HR	13.09	13.55	12.02	12.89
NO <sub>x</sub> (ppm @ 15% O <sub>2</sub> )	288.55	300.46	261.39	283.47
NO <sub>x</sub> LB/MMBTU	1.06	1.11	0.96	1.04
NO <sub>x</sub> Tons/Year	57.35	59.36	52.63	56.45
H <sub>2</sub> CO Inlet ppmw	7.51	7.34	7.25	7.37
H <sub>2</sub> CO Inlet (ppmw @ 15% O <sub>2</sub> )	2.69	2.63	2.61	2.65
H <sub>2</sub> CO Outlet ppmw	0.61	0.69	0.60	0.63
H <sub>2</sub> CO Outlet (ppmw @ 15% O <sub>2</sub> )	0.24	0.26	0.24	0.25
H <sub>2</sub> CO % Removal Limit is 76%	91.08	90.22	90.88	90.73
H <sub>2</sub> O ppm (% FTIR)	14.72	15.43	14.70	14.95
% O <sub>2</sub> Inlet (raw measured wet)	4.42	4.44	4.53	4.46
% O <sub>2</sub> Outlet (raw measured wet)	5.86	5.15	5.95	5.65
% O <sub>2</sub> (BIAS Corrected Dry)	6.22	6.18	6.23	6.21
<b>Calculated Flows</b>				
Fuel Flow - (SCFM)	193.00	191.83	195.50	193.44
Fuel Flow - (SCFH)	11,580	11,510	11,730	11,607
Exhaust Flow (LB/HR)	10,763.3	10,659.2	10,904.3	10,776
Exhaust Flow (WSCFM)	2,809.5	2,699.6	2,858.1	2,789
Air Flow (WSCFM)	2,463	2,441	2,496	2,467
Exhaust Flow Method 19 (scfm)	2,541	2,518	2,575	2,545
Exhaust Flow Method 19 (lbm/min)	118	117	120	118
Exhaust Flow Carbon Balance (lbm/min)	205.58	203.75	208.32	206
Air flow Beshouri (scfm)	2,674.79	2,650.88	2,710.41	2,679
<b>Fuel Flow Measurements</b>				
Fuel Flow From Screen(MSCFH)	11.58	11.51	11.73	11.61
<b>** BASED ON FUEL SPECIFIC DRY F-FACTOR CALCULATION</b>	Run 1	Run 2	Run 3	
<b>* BASED ON CARBON BALANCE (STOICH. + O<sub>2</sub>)</b>				
<b>- A/F IS TOTAL MASS RATIO</b>				



**Table 16 . Engine Operating and Ambient Conditions -Unit EUWL008**

Run	1	2	3	
Date	07/23/21	07/23/21	07/23/21	
Time	8:27	9:40	10:53	
<b>Engine Operating Conditions</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>Averages</b>
Unit Horsepower from Control Panel	1,259.0	1,268.0	1,276.0	1,267.7
Unit Speed (rpm)	328.0	332.0	328.0	329.3
Compressor Suction Pressure (PSIG)	530.0	531.0	532.0	531.0
Compressor Suction Temperature (°F)	54.1	54.3	54.6	54.3
Compressor Discharge Pressure (PSIG)	785.0	786.0	790.0	787.0
Compressor Flow (MMSCF/D)	63.2	63.9	63.9	63.7
% Load	95.4	96.1	96.7	96.0
% Torque	96.0	95.5	97.3	96.2
Heat Rate (BTU/HP-hr)	8,852.2	8,819.7	8,749.4	8,807.1
<b>Ambient Conditions</b>				
Ambient Temperature (°F)	65.00	65.00	67.00	65.67
Barometric Pressure (psi)	14.28	14.28	14.29	14.28
Ambient Relative Humidity (%)	98.00	98.00	98.00	98.00
Absolute Humidity (grains/LB)	194.56	194.55	209.14	199.42



**Table 17. Emissions Concentrations, Calculated  
Mass Emissions, Concentrations & Flows -Unit EUWL008**

Run	1	2	3	
Date	07/23/21	07/23/21	07/23/21	
Time	8:27	9:40	10:53	
<b>Emissions Concentrations &amp; Calculated Mass Emissions</b>				
NO <sub>x</sub> ppm (BIAS Corrected)	590.95	647.90	663.20	634.02
NO <sub>x</sub> g/BHP-HR	3.87	4.21	4.29	4.12
NO <sub>x</sub> LB/HR	10.73	11.78	12.07	11.53
NO <sub>x</sub> (ppm @ 15% O <sub>2</sub> )	236.50	258.60	265.53	253.54
NO <sub>x</sub> LB/MMBTU	0.87	0.95	0.98	0.93
NO <sub>x</sub> Tons/Year	47.00	51.57	52.87	50.48
H <sub>2</sub> CO Inlet ppmw	14.20	11.27	10.84	12.10
H <sub>2</sub> CO Inlet (ppmw @ 15% O <sub>2</sub> )	5.24	4.19	4.03	4.49
H <sub>2</sub> CO Outlet ppmw	0.98	0.92	0.88	0.93
H <sub>2</sub> CO Outlet (ppmw @ 15% O <sub>2</sub> )	0.38	0.35	0.34	0.36
H <sub>2</sub> CO % Removal Limit is 76%	92.72	91.73	91.43	91.96
H <sub>2</sub> O ppm (% FTIR)	15.04	15.84	15.12	15.34
% O <sub>2</sub> Inlet (raw measured wet)	4.92	5.02	5.02	4.99
% O <sub>2</sub> Outlet (raw measured wet)	5.80	5.20	5.91	5.64
% O <sub>2</sub> (BIAS Corrected Dry)	6.16	6.12	6.16	6.15
<b>Calculated Flows</b>				
Fuel Flow - (SCFM)	193.17	193.83	193.50	193.50
Fuel Flow - (SCFH)	11,590	11,630	11,610	11,610
Exhaust Flow (LB/HR)	10,792.9	10,794.8	10,811.3	10,800
Exhaust Flow (WSCFM)	2,800.7	2,730.5	2,820.4	2,784
Air Flow (WSCFM)	2,452	2,454	2,457	2,454
Exhaust Flow Method 19 (scfm)	2,530	2,532	2,535	2,532
Exhaust Flow Method 19 (lbm/min)	117	118	118	118
Exhaust Flow Carbon Balance (lbm/min)	204.72	204.93	205.17	205
Air flow Beshouri (scfm)	2,663.54	2,666.24	2,669.31	2,666
<b>Fuel Flow Measurements</b>				
Fuel Flow From Screen(MSCFH)	11.59	11.63	11.61	11.61
<b>** BASED ON FUEL SPECIFIC DRY F-FACTOR CALCULATION</b>	Run 1	Run 2	Run 3	
<b>* BASED ON CARBON BALANCE (STOICH. + O<sub>2</sub>)</b>				
<b>- A/F IS TOTAL MASS RATIO</b>				



**Table 18 . Engine Operating and Ambient Conditions -Unit EUWL009**

Run	1	2	3	
Date	07/23/21	07/23/21	07/23/21	
Time	13:23	14:35	15:48	
<b>Engine Operating Conditions</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>HS-HT</b>	<b>Averages</b>
Unit Horsepower from Control Panel	1,221.0	1,228.0	1,248.0	1,232.3
Unit Speed (rpm)	321.0	314.0	323.0	319.3
Compressor Suction Pressure (PSIG)	443.0	436.0	436.0	438.3
Compressor Suction Temperature (°F)	57.3	57.9	59.5	58.2
Compressor Discharge Pressure (PSIG)	714.0	714.0	718.0	715.3
Compressor Flow (MMSCF/D)	50.1	48.7	49.0	49.3
% Load	92.5	93.0	94.5	93.4
% Torque	95.1	97.8	96.6	96.5
Heat Rate (BTU/HP-hr)	8,348.1	8,394.4	8,360.1	8,367.5
<b>Ambient Conditions</b>				
Ambient Temperature (°F)	68.00	72.00	75.00	71.67
Barometric Pressure (psi)	14.29	14.27	14.26	14.27
Ambient Relative Humidity (%)	90.00	84.00	79.00	84.33
Absolute Humidity (grains/LB)	198.33	213.03	222.16	211.17



**Table 19. Emissions Concentrations, Calculated  
Mass Emissions, Concentrations & Flows -Unit EUWL009**

Run	1	2	3	
Date	07/23/21	07/23/21	07/23/21	
Time	13:23	14:35	15:48	
<b>Emissions Concentrations &amp; Calculated Mass Emissions</b>				
NO <sub>x</sub> ppm (BIAS Corrected)	2065.14	2202.81	2110.80	2126.25
NO <sub>x</sub> g/BHP-HR	11.93	12.76	12.21	12.30
NO <sub>x</sub> LB/HR	32.11	34.54	33.59	33.42
NO <sub>x</sub> (ppm @ 15% O <sub>2</sub> )	773.73	823.06	790.83	795.88
NO <sub>x</sub> LB/MMBTU	2.85	3.03	2.91	2.93
NO <sub>x</sub> Tons/Year	140.64	151.31	147.14	146.37
H <sub>2</sub> CO Inlet ppmw	41.64	41.45	40.12	41.07
H <sub>2</sub> CO Inlet (ppmw @ 15% O <sub>2</sub> )	13.89	13.89	13.34	13.71
H <sub>2</sub> CO Outlet ppmw	3.29	3.38	3.15	3.27
H <sub>2</sub> CO Outlet (ppmw @ 15% O <sub>2</sub> )	1.21	1.19	1.16	1.19
H <sub>2</sub> CO % Removal Limit is 76%	91.27	91.46	91.29	91.34
H <sub>2</sub> O ppm (% FTIR)	16.18	16.89	16.23	16.43
% O <sub>2</sub> Inlet (raw measured wet)	3.22	3.30	3.15	3.22
% O <sub>2</sub> Outlet (raw measured wet)	4.90	4.10	4.90	4.63
% O <sub>2</sub> (BIAS Corrected Dry)	5.15	5.11	5.15	5.14
<b>Calculated Flows</b>				
Fuel Flow - (SCFM)	176.67	178.67	180.83	178.72
Fuel Flow - (SCFH)	10,600	10,720	10,850	10,723
Exhaust Flow (LB/HR)	9,322.1	9,381.3	9,515.4	9,406
Exhaust Flow (WVSCFM)	2,438.3	2,379.3	2,495.8	2,438
Air Flow (WVSCFM)	2,100	2,118	2,150	2,123
Exhaust Flow Method 19 (scfm)	2,166	2,185	2,217	2,189
Exhaust Flow Method 19 (lbm/min)	101	102	103	102
Exhaust Flow Carbon Balance (lbm/min)	176.22	177.77	180.38	178
Air flow Beshouri (scfm)	2,292.70	2,312.86	2,346.77	2,317
<b>Fuel Flow Measurements</b>				
Fuel Flow From Screen(MSCFH)	10.60	10.72	10.85	10.72
<b>** BASED ON FUEL SPECIFIC DRY F-FACTOR CALCULATION</b>	Run 1	Run 2	Run 3	
<b>* BASED ON CARBON BALANCE (STOICH. + O<sub>2</sub>)</b>				
<b>- A / F IS TOTAL MASS RATIO</b>				



**3. FACILITY AND PROCESS DESCRIPTION**

TC Energy’s ANR Woolfolk Compressor Station is located in Big Rapids, MI. The facility operates five Ingersoll-Rand Compressor Engine labeled EUWL001, EUWL002, EUWL003 EUWL004, and EUWL005. The engines are a four stroke, rich burn, natural gas fired reciprocating compressor engine, Model KVG-103, 1000 horsepower, and used to compress natural gas for transport via natural gas pipeline. The units is subject to the RICE MACT and Rule 818 and are subject to 40 CFR Part 63, Subpart ZZZZ requirements.

Units EUWL007-EUWL009 are Ingersoll-Rand Compressor Engine Model KVG-123, 1320hp; used to compress natural gas for transport via natural gas pipeline. The units are a four stroke, rich burn, natural gas fired reciprocating compressor engines. The units is subject to the RICE MACT and Rule 818 and are subject to 40 CFR Part 63, Subpart ZZZZ requirements.

Process data is specified in Table 3. General engine information is located in Table 4.

<b>Table 20. Process Data (Horsepower)</b>					
<b>Unit</b>	<b>Run 1</b>	<b>Run 2</b>	<b>Run 3</b>	<b>Average</b>	<b>Rated</b>
EUWL001	971.0	972.0	954.0	965.7	1,000
EUWL002	918.0	978.0	961.0	952.3	1,000
EUWL003	957.0	964.0	952.0	957.7	1,000
EUWL004	977.0	951.0	948.0	958.7	1,000
EUWL005	905.0	933.0	933.0	923.7	1,000
EUWL007	1,272.0	1,243.0	1,271.0	1,262.0	1,320
EUWL008	1,259.0	1,268.0	1,276.0	1,267.7	1,320
EUWL009	1,221.0	1,228.0	1,248.0	1,232.3	1,320



**Table 21. Unit EUWL001 General Information**

General Information		Permit Limits			
Date:	20-Jul-21	ppm@15%	g/Bhp-Hr	lb/hr	TPY
Company:	TC Energy	NOx:	20.5	45.19	
Station:	Woolfolk	CO:			
Unit:	1	VOC:			
Engine Type:	IR KVG 103	H2CO:	>76 DE		
Rated RPM:	330 RPM	<i>Limits are actually listed as average values</i>			
Rated BHP:	1000 BHP				
Fuel Gas Analysis		Fuel Meter Type			
Constituent	Mole Percent	Enter Type from List Below			
Nitrogen	0.654	Orifice Meter (upstream pressure tap):	2		
Carbon Dioxide	0.312	Orifice Meter (downstream pressure tap):	1		
Methane	91.027	Electronic Flow Meter (EFM):	2		
Ethane	7.680	Venturi (Nozzle) Meter:	3		
Propane	0.288	Roots Meter w/ Accumulator:	4		
I-Butane	0.016		5		
N-Butane	0.019	Pipe I.D.:	3.068		
I-Pentane	0.001	Orifice I.D.:	1.5		
N-Pentane	0.000				
Hexane +	0.002				
Total	100.000				



**Table 22. Unit EUWL002 General Information**

General Information		Permit Limits				
Date:	20-Jul-21	ppm@15%	g/Bhp-Hr	lb/hr	TPY	
Company:	TC Energy	NOx:	20.5	45/19		
Station:	Woolfolk	CO:				
Unit:	2	VOC:				
Engine Type:	IR KVG 103	H2CO:	>76 DE			
Rated RPM:	330 RPM	<i>Limits are actually listed as average values</i>				
Rated BHP:	1000 BHP					
Fuel Gas Analysis		Fuel Meter Type				
Constituent	Mole Percent	Enter Type from List Below				
Nitrogen	0.654	2				
Carbon Dioxide	0.312	Orifice Meter (upstream pressure tap):	1			
Methane	91.027	Orifice Meter (downstream pressure tap):	2			
Ethane	7.680	Electronic Flow Meter (EFM):	3			
Propane	0.288	Venturi (Nozzle) Meter:	4			
I-Butane	0.016	Roots Meter w/ Accumulator:	5			
N-Butane	0.019	Pipe I.D.:	3.068			
I-Pentane	0.001	Orifice I.D.:	1.5			
N-Pentane	0.000					
Hexane +	0.002					
Total	100.000					



**Table 23. Unit EUWL003 General Information**

General Information		Permit Limits			
Date:	21-Jul-21	ppm@15%	g/Bhp-Hr	lb/hr	TPY
Company:	TC Energy		20.5	45.15	
Station:	Woolfolk				
Unit:	3				
Engine Type:	IR KVG 103	<i>Limits are actually listed as average values</i>			
Rated RPM:	330 RPM				
Rated BHP:	1000 BHP				
Fuel Gas Analysis		Fuel Meter Type			
Constituent	Mole Percent	Enter Type from List Below			
Nitrogen	0.638	Orifice Meter (upstream pressure tap):	1		
Carbon Dioxide	0.298	Orifice Meter (downstream pressure tap):	2		
Methane	90.880	Electronic Flow Meter (EFM):	3		
Ethane	7.887	Venturi (Nozzle) Meter:	4		
Propane	0.272	Roots Meter w/ Accumulator:	5		
I-Butane	0.012		Pipe I.D.: 3.068		
N-Butane	0.011		Orifice I.D.: 1.5		
I-Pentane	0.000				
N-Pentane	0.000				
Hexane +	0.002				
Total	100.000				



**Table 24. Unit EUWL004 General Information**

General Information		Permit Limits			
Date:	21-Jul-21	ppm@15%	g/Bhp-Hr	lb/hr	TPY
Company:	TC Energy	NOx:	20.5	45.19	
Station:	Woolfolk	CO:			
Unit:	4	VOC:			
Engine Type:	IR KVG 103	H2CO:	>76 DE		
Rated RPM:	330 RPM	<i>Limits are actually listed as average values</i>			
Rated BHP:	1000 BHP				
Fuel Gas Analysis		Fuel Meter Type			
Constituent	Mole Percent	Enter Type from List Below			
Nitrogen	0.638	2			
Carbon Dioxide	0.298	Orifice Meter (upstream pressure tap):	1		
Methane	90.880	Orifice Meter (downstream pressure tap):	2		
Ethane	7.887	Electronic Flow Meter (EFM):	3		
Propane	0.272	Venturi (Nozzle) Meter:	4		
I-Butane	0.012	Roots Meter w/ Accumulator:	5		
N-Butane	0.011	Pipe I.D.:	3.068		
I-Pentane	0.000	Orifice I.D.:	1.5		
N-Pentane	0.000				
Hexane +	0.002				
Total	100.000				



**Table 25. Unit EUWL005 General Information**

General Information		Permit Limits			
Date:	22-Jul-21	ppm@15%	g/Bhp-Hr	lb/hr	TPY
Company:	TC Energy	NOx:	20.5	45.19	
Station:	Woolfolk	CO:			
Unit:	5	VOC:			
Engine Type:	IRKVG 103	H2CO:	>76 DE		
Rated RPM:	330 RPM	<i>Limits are actually listed as average values</i>			
Rated BHP:	1000 BHP				
Fuel Gas Analysis		Fuel Meter Type			
Constituent	Mole Percent	Enter Type from List Below			
Nitrogen	0.689	Orifice Meter (upstream pressure tap):	1		
Carbon Dioxide	0.338	Orifice Meter (downstream pressure tap):	2		
Methane	91.108	Electronic Flow Meter (EFM):	3		
Ethane	7.590	Venturi (Nozzle) Meter:	4		
Propane	0.254	Roots Meter w/ Accumulator:	5		
I-Butane	0.009	Pipe I.D.:	3.068		
N-Butane	0.010	Orifice I.D.:	1.5		
I-Pentane	0.000				
N-Pentane	0.000				
Hexane +	0.002				
Total	100.000				



**Table 26. Unit EUWL007 General Information**

General Information		Permit Limits				
Date:	22-Jul-21	ppm@15%	g/Bhp-Hr	lb/hr	TPY	
Company:	TC Energy	NOx:	20.5	59.56		
Station:	Woolfolk	CO:				
Unit:	7	VOC:				
Engine Type:	IR KVG 123	H2CO:	>76 DE			
Rated RPM:	330 RPM	<i>Limits are actually listed as average values</i>				
Rated BHP:	1320 BHP					
Fuel Gas Analysis		Fuel Meter Type				
Constituent	Mole Percent	Enter Type from List Below				
Nitrogen	0.689	2				
Carbon Dioxide	0.338	Orifice Meter (upstream pressure tap):	1			
Methane	91.108	Orifice Meter (downstream pressure tap):	2			
Ethane	7.590	Electronic Flow Meter (EFM):	3			
Propane	0.254	Venturi (Nozzle) Meter:	4			
I-Butane	0.009	Roots Meter w/ Accumulator:	5			
N-Butane	0.010	Pipe I.D.:	3.068			
I-Pentane	0.000	Orifice I.D.:	1.5			
N-Pentane	0.000					
Hexane +	0.002					
Total	100.000					



**Table 27. Unit EUWL008 General Information**

General Information		Permit Limits			
Date:	23-Jul-21	ppm@15%	g/Bhp-Hr	lb/hr	TPY
Company:	TC Energy		20.5	59.66	
Station:	Woolfolk	NOx:			
Unit:	8	CO:			
Engine Type:	IRKVG 123	VOC:			
Rated RPM:	330 RPM	H2GO:	>76 DE		
Rated BHP:	1320 BHP	<i>Limits are actually listed as average values</i>			
Fuel Gas Analysis		Fuel Meter Type			
Constituent	Mole Percent	Enter Type from List Below			
Nitrogen	0.575	2			
Carbon Dioxide	0.296	Orifice Meter (upstream pressure tap):	1		
Methane	91.557	Orifice Meter (downstream pressure tap):	2		
Ethane	7.319	Electronic Flow Meter (EFM):	3		
Propane	0.228	Venturi (Nozzle) Meter:	4		
I-Butane	0.011	Roots Meter w/ Accumulator:	5		
N-Butane	0.012	Pipe I.D.:	3.068		
I-Pentane	0.001	Orifice I.D.:	1.5		
N-Pentane	0.000				
Hexane +	0.002				
Total	100.000				



**Table 28. Unit EUWL009 General Information**

General Information		Permit Limits				
Date:	23-Jul-21	NOx:	ppm@15%	g/Bhp-Hr	lb/hr	TPY
Company:	TC Energy	CO:		20.5	59.66	
Station:	Woolfolk	VOC:				
Unit:	9	H2CO:	>76 DE			
Engine Type:	IR KVG 123	<i>Limits are actually listed as average values</i>				
Rated RPM:	330 RPM					
Rated BHP:	1320 BHP					
Fuel Gas Analysis		Fuel Meter Type				
Constituent	Mole Percent	Enter Type from List Below				
Nitrogen	0.575	2				
Carbon Dioxide	0.296	Orifice Meter (upstream pressure tap):	1			
Methane	91.557	Orifice Meter (downstream pressure tap):	2			
Ethane	7.319	Electronic Flow Meter (EFM):	3			
Propane	0.228	Venturi (Nozzle) Meter:	4			
I-Butane	0.011	Roots Meter w/ Accumulator:	5			
N-Butane	0.012	Pipe I.D.:	3.068			
I-Pentane	0.001	Orifice I.D.:	1.5			
N-Pentane	0.000					
Hexane +	0.002					
Total	100.000					



#### 4. TEST PROCEDURES

EQM and EQM's affiliates and subcontractors use current U.S. EPA accepted testing methodologies in their Air Quality Programs as listed in the U.S. Code of Federal Regulations, Title 40, Part 60, Appendix A. For this testing program, the following specific methodologies were utilized:

- U.S. EPA Method 3A – Determination of Oxygen and Carbon Dioxide Concentrations in Emissions From Stationary Sources (Instrumental Analyzer Procedure)
- U.S. EPA Method 7E– Determination of Nitrogen Oxides Emissions From Stationary Sources (Instrumental Analyzer Procedure)
- U.S. EPA Method 19– Determination of Volumetric Flow Rate From Stationary Sources
- U.S. EPA Method 320– Determination of Formaldehyde From Stationary Sources (Extractive Fourier Transform infrared (FTIR) Spectrometry)

USEPA Methods 3A, 7E, and 19 were performed at the Exhaust Stack sampling location by continuously extracting a gas sample from the stack through a single point stainless steel sample probe. The extracted sample was pulled through a series of filters to remove any particulate matter. Directly after the probe, the sample was conditioned by a series of refrigeration dryers to remove moisture from the gas stream. After the refrigeration dryers, the sample was transported through a Teflon® line to the analyzers. The flow of the stack gas sample was regulated at a constant rate to minimize drift.

At the start of the day, each monitor was checked for calibration error by introducing zero, mid-range and high-range EPA Protocol 1 gases to the measurement system at a point upstream of the analyzers. In this report, the calibration error test is referred to as instrument calibration. The gas was injected into the sampling valve located at the outlet of the sampling probe. The bias test was conducted before and after each consecutive test run by introducing zero and upscale calibration gases for each monitor. The upscale calibration gases used for each monitor were the high calibration gases.

Measurement System Performance Specifications were as follows:

- Analyzer Calibration Error - Less than +/- 2% of the span of the zero, mid-range and high-range calibration gases.
- Sampling System Bias - Less than +/-5% of the span for the zero, mid-range and high-range calibration gases.
- Zero Drift - Less than +/-3% of the span over the period of each test run.
- Calibration Drift - Less than +/-3% of the span over the period of each set of runs.



USEPA Method 320 was performed at the Exhaust Stack sampling locations by using MKS MultiGas 2030 FTIR spectrometers. The FTIRs were equipped with temperature-controlled, 5.11 meter multipass gas cells maintained at 191 °C. Gas flows and sampling system pressures were monitored using rotameters and pressure transducers. All data were collected at 0.5 cm-1 resolution. Each spectrum was derived from the coaddition of 64 scans, with a new data point generated approximately every one minute. Additional information may be found in Appendix A.

Calculations that were used in this testing event for the Unit 11 and Unit 12 are as follows:

Calibration Correction

$$C_{GAS} = (C_R - C_O) \frac{C_{MA}}{C_M - C_O}$$

Where:

- $C_{GAS}$ : Corrected flue gas concentration (ppmvd)
- $C_R$ : Flue gas concentration (ppmvd)
- $C_O$ : Average of initial and final zero checks (ppmvd)
- $C_M$ : Average of initial and final span checks (ppmvd)
- $C_{MA}$ : Actual concentration of span gas (ppmvd)

EPA F-Factor

$$F_d = \frac{[(3.64 \cdot H_{W\%} \cdot 100) + (1.53 \cdot C_{W\%} \cdot 100)]}{GCV} \cdot 10^6 + \frac{[(0.14 \cdot N_{2W\%} \cdot 100) - (0.46 \cdot O_{2W\%} \cdot 100)]}{GCV} \cdot 10^6 \cdot \frac{\rho_{FuelGas}}{\rho_{FuelGas}}$$

Where:

- $F_d$ : Fuel specific F-factor, dscf/MMBtu
- $H_{W\%}$ : Hydrogen weight percent
- $C_{W\%}$ : Carbon weight percent
- $N_{2W\%}$ : Nitrogen weight percent
- $O_{2W\%}$ : Oxygen weight percent
- $GCV$ : Heating value of the fuel, BTU/dscf



$\rho_{Fuel Gas}$ : Density of the fuel gas, lb/scf

Formaldehyde Removal Efficiency, RE (%)

$$RE = \left( \frac{\text{Inlet Formaldehyde} - \text{Outlet Formaldehyde}}{\text{Inlet Formaldehyde}} \right) \times 100$$

**Where:**

Inlet Formaldehyde = Inlet formaldehyde concentration at 15% O<sub>2</sub>

Outlet Formaldehyde = Inlet formaldehyde concentration at 15% O<sub>2</sub>

Inlet Analyzer Drift Correction

$$C_{gas} = (C_{Ave} - CO) \left( \frac{C_{ma}}{C_m - CO} \right)$$

**Where:**

- $C_{GAS}$ : Average effluent gas concentration adjusted for bias
- $C_{Ave}$ : Average unadjusted gas concentration indicated by data recorder for the test run
- $CO$ : Average of initial and final zero checks
- $C_M$ : Actual concentration of the upscale calibration gas
- $C_{MA}$ : Average of initial and final system calibration bias check responses for the upscale calibration gas

Outlet Analyzer Drift Correction

$$C_{gas} = (C_{Ave} - CO) \left( \frac{C_{ma}}{C_m - CO} \right)$$

**Where:**

- $C_{GAS}$ : Average effluent gas concentration adjusted for bias
- $C_{Ave}$ : Average unadjusted gas concentration indicated by data recorder for the test run
- $CO$ : Average of initial and final zero checks (ppmvd)
- $C_M$ : Actual concentration of the upscale calibration gas
- $C_{MA}$ : Average of initial and final system calibration bias check responses for the upscale calibration gas



Inlet Concentration,  $C_1$  (corrected to 15%  $O_2$ )

$$\text{Conc. } i_{(\text{Std. } O_2)} = \text{Conc. } i_{(\text{Measured } O_2)} \left( \frac{20.9\% - \text{Std. } O_2\%}{20.9\% - \text{Measured } O_2\%} \right)$$

**Where:**

Conc.  $i_{(\text{Std. } O_2)}$  = Concentration at standard  $O_2$  level

Conc.  $i_{(\text{Measured } O_2)}$  = Concentration measured at  $O_2$  level

Std.  $O_2\%$  = Oxygen concentration at standard level

Measured  $O_2\%$  = Oxygen concentration at measured level

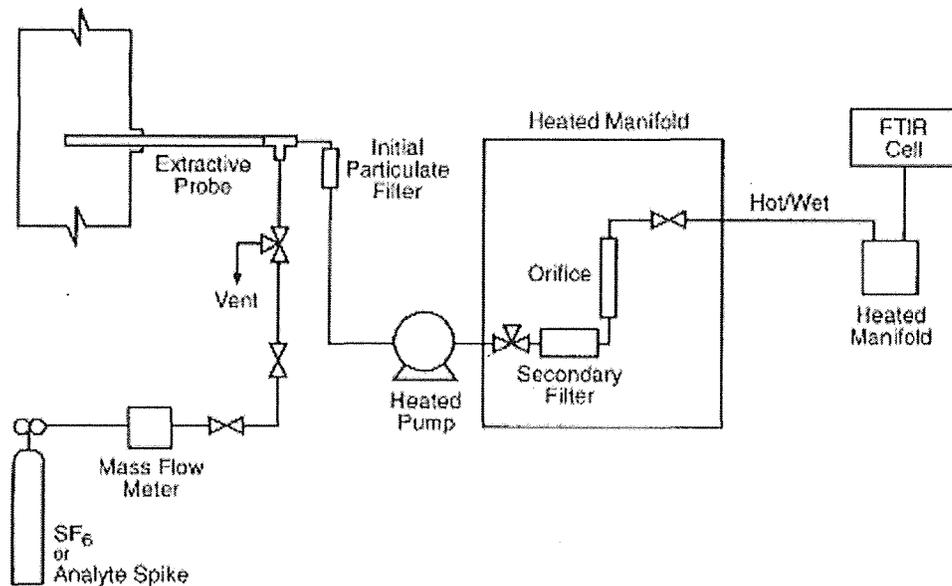


Figure 1. USEPA Method 320 Sampling Train

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## 5. QUALITY ASSURANCE PROCEDURES

Each reference method presented in the U.S. Code of Federal Regulations details the instrument calibration requirements, sample recovery and analysis, data reduction and verification, types of equipment required, and the appropriate sampling and analytical procedures to ensure maximum performance and accuracy. EQM and EQM's affiliates and subcontractors adhere to the guidelines for quality control set forth by the United States Environmental Protection Agency. These procedures are outlined in the following documents:

- Code of Federal Regulations, Title 40, Part 51
- Code of Federal Regulations, Title 40, Part 60
- Quality Assurance Handbook, Volume 1, EPA 600/9-76-005
- Quality Assurance Handbook, Volume 2, EPA 600/4-77-027a
- Quality Assurance Handbook, Volume 3, EPA 600/4-77-027b



## 6. CONCLUSIONS

An Emissions Test was conducted on the internal combustion compressor engines labeled Unit EUWL001, Unit EUWL002, Unit EUWL003, Unit EUWL004, Unit EUWL005, Unit EUWL007, Unit EUWL008, and Unit EUWL009 at TC Energy's ANR Pipeline Company's Woolfolk Compressor Station located in Big Rapids, Michigan. The testing was conducted on July 20-23, 2021.

During the course of the testing, the eight engines conformed to the requirements of flexible groups FG-RICE-818-WLENGINES and RICE MACT in the permit and are subject to 40 CFR Part 63, Subpart ZZZZ requirement..

The usefulness and/or significance of the emissions values presented in this document as they relate to the compliance status of the emissions shall be determined by others.

For additional information pertaining to the testing program see Appendix D of this report



## **A. FIELD DATA**