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COMPLIANCE TEST REPORT

for

RESPONSE CORRELATION AUDIT (RCA)

PARTICULATE MATTER CONTINUOUS EMISSIONS MONITORING SYSTEM (PM CEMS)

EU-UNIT2

Monroe Power Plant
Monroe, Michigan

October 16-21, 2024

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CONTENTS

Section		Page
EXECUTIVE SUMMARY		IV
1.0	INTRODUCTION	1
2.0	SOURCE DESCRIPTION	1
3.0	SAMPLING AND ANALYTICAL PROCEDURES	2
3.1	STACK GAS VELOCITY AND FLOWRATES (USEPA METHODS 1-2)	2
3.1.1	Sampling Method	2
3.1.2	Method 2 Sampling Equipment	3
3.2	OXYGEN & CARBON DIOXIDE (USEPA METHOD 3A)	3
3.2.1	Sampling Method	3
3.2.2	O_2/CO_2 Sampling Train	3
3.2.3	Sampling Train Calibration	3
3.3	MOISTURE DETERMINATION (USEPA METHOD 4)	4
3.3.1	Sampling Method	4
3.4	PARTICULATE MATTER (USEPA METHOD 5B)	4
3.4.1	Filterable Particulate Sampling Method	4
3.4.2	Quality Control and Assurance	5
3.4.3	Data Reduction	5
4.0	OPERATING PARAMETERS	5
5.0	DISCUSSION OF RESULTS	5
6.0	CERTIFICATION STATEMENT	6

RESULTS TABLE

Table No. 1: ..... UNIT 2 PM CEMS RCA Results

Table No. 2: ..... UNIT 2 PM CEMS Correlation Graph

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FIGURES

1 Sampling Location – UNIT 2 FGD Stack
2 Sampling Points – UNIT 2 FGD Stack
3 USEPA Method 3A Sampling Train
4 USEPA Method 5B Sampling Train

APPENDICES

A EGLE Test Plan and Approval Letter
B Field Data
C Analytical Data
D Equipment and Analyzer Calibration Data
E Operational Data
F Example Calculations
G PS-11 Statistical Analysis
H RWDI Data Runs 1-10

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EXECUTIVE SUMMARY

DTE Energy's Environmental Management and Safety (EMS) Environmental Field Services Group along with RWDI USA LLC performed a Response Correlation Audit (RCA) on the Particulate Matter Continuous Emissions Monitoring System (PM CEMS). The test was a retest of the October 7-9 RCA performed on the UNIT 2 FGD exhaust stack located at the Monroe Power Plant, in Monroe, Michigan. Testing is required by 40 CFR Part 63 Subpart UUUUU and the Unit is regulated under Michigan Department of Environment, Great Lakes, and Energy (EGLE) Renewable Operating Permit (ROP) No. MI-ROP-B2816-2019. UNIT 2 is identified as emission unit "EU-UNIT2" in the ROP. Testing was conducted October 16-21, 2024, in accordance with Procedure 2 of 40 CFR Part 60, Appendix F. Following testing, a new Correlation Curve could not be established per Procedure 2 (see Appendix G). The Unit 2 PM CEM was determined to remain "Out of Control "until the PM CEM can be repaired/replaced and further testing can be completed.

Criteria for acceptable RCA results is located in Procedure 2 Sec 10.4(5)(i-ii) and is summarized below.

	PM CEMS (mg/acm)[1]	RM PM (mg/acm)[1]	PM CEMS (correlation)	Correlation (-25% Emission Limit)	Correlation (+25% Emission Limit)
PM-1	35	10.63	9.3	7.37	11.27
PM-2	35.3	10.48	9.4	7.42	11.32
PM-3	33.6	9.33	9.1	7.12	11.02
PM-4	33.6	6.59	9.1	7.12	11.02
PM-5	36.7	8.25	9.6	7.66	11.56
PM-6	18.7	8.76	6.2	4.24	8.14
PM-7	19.3	4.45	6.3	4.37	8.27
PM-8	18.9	6.59	6.2	4.28	8.18
PM-9	18.6	11.42	6.2	4.22	8.12
PM-10	17.9	12.97	6.0	4.06	7.96
PM-11	9.5	8.25	4.0	2.03	5.93
PM-12	9.4	8.44	3.9	2.00	5.90
PM-13	9	8.68	3.8	1.89	5.79
PM-14	9.6	7.73	4.0	2.05	5.95
PM-15	9.4	7.34	3.9	2.00	5.90
PM CEMS < Greatest PM CEMS Response on correlation regression line				***≤54.1 mg/acm***	***Fail***
9 of 12 PM CEMS and RM w/in 25% of numerical emission limit on correlation regression line					***Fail***

[1]mg/acm @ 160° C

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1.0 INTRODUCTION

DTE Energy's Environmental Management and Safety (EMS) Environmental Field Services Group along with RWDI USA LLC (RWDI) performed a Response Correlation Audit (RCA) on the Particulate Matter Continuous Emissions Monitoring System (PM CEMS). The test was a retest of the October 7-9 RCA performed on the UNIT 2 FGD exhaust stack located at the Monroe Power Plant, in Monroe, Michigan. Testing is required by 40 CFR Part 63 Subpart UUUUU and the Unit is regulated under Michigan Department of Environment, Great Lakes, and Energy (EGLE) Renewable Operating Permit (ROP) No. MI-ROP-B2816-2019. UNIT 2 is identified as emission unit "EU-UNIT2" in the ROP. Testing was conducted October 16-21, 2024, in accordance with Procedure 2 of 40 CFR Part 60, Appendix F. Following testing, a new Correlation Curve could not be established per Procedure 2 (see Appendix G). The Unit 2 PM CEM was determined to remain "Out of Control" until the PM CEM can be repaired/replaced and further testing can be completed.

Testing was performed pursuant to Title 40, *Code of Federal Regulations*, Part 60, Appendix A (40 CFR §60 App. A), Methods 1-5B. Criterion for acceptable RCA results are located in Part 60, Appendix F Procedure 2 Sec 10.4(5)(i-ii).

The fieldwork was performed in accordance with EPA Reference Methods and EMS's Intent to Test.[1] The testing was divided between RWDI and DTE. The following RWDI personnel participated in the testing program (Runs 1-10): Mike Nummer, Sr. Field Technician, David Trahan and Roy Zimmer, Field Technicians. The following DTE personnel participated in the testing program (Runs 11-15): Mr. Mark Grigereit, Principal Engineer, Sr. Environmental Specialist, Mr. Mark Westerberg, Sr. Environmental Specialist, Mr. Fred Meinecke, Environmental Specialist, and Mr. Kenneth St. Amant, Environmental Specialist. Mr. Grigereit was the project leader. Coordination with the facility was performed by Mr. Jason Logan, Principal Specialist.

2.0 SOURCE DESCRIPTION

The Monroe Power Plant is a DTE Energy facility located at 3500 E. Front Street in Monroe, Michigan. The plant has four (4) coal-fired electric generating units, referred to as Units 1, 2, 3, and 4. These units were placed in service between 1971 and 1974, and have a total electric generating capacity of 3,135 megawatts (gross). The boiler (Babcock & Wilcox) for each unit is a similar supercritical pressure, pulverized coal-fired cell burner boiler. Units 1-4 exhaust into dedicated, separate stacks.

Units 1 and 4 have General Electric turbine generators, each having a current capability of 817 gross megawatts (GMW). Units 2 and 3 have Westinghouse turbine generators, each having a current capability of 823 GMW.

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[1] EGLE, Test Plan, Submitted September 6, 2024. (Attached-Appendix A)

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The boiler exhausts are each equipped with Research Cottrell electrostatic precipitators (ESPs), with particulate removal efficiencies of 99.6%. There is a sulfur trioxide flue gas conditioning system on each unit that is only used on an "as needed basis" to lower the resistivity of the fly ash for better collection by the ESPs. None of the four units is equipped with sulfuric acid mist control equipment.

Units 1 - 4 each have Selective Catalytic Reduction (SCR) systems to control 90% of the NO_x emissions prior to their respective ESP's. Each unit has wet Flue Gas Desulfurization (FGD) Scrubbers to control sulfur dioxide (SO_2), and other acid gases. The boilers at Monroe Power Plant employ the use of continuous soot-blowing, therefore a separate soot blowing PM test was not necessary. The exhaust stacks for Units 1-4 are each 580 feet tall with an internal diameter of 28 feet. See Figure 1 for a diagram of Units' sampling locations and stack dimensions.

Monroe Power Plant utilizes Sick AG model FWE200 dust measuring systems. The analyzers utilize a measuring technique based off scattered light principal. The FWE200 model is specific for low to medium dust collections after a wet scrubber.

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:

Sampling Method	Parameter	Analysis
USEPA Methods 1-2	Exhaust Gas Flow Rates	Field data analysis and reduction
USEPA Method 3A	O_2 & CO_2	Instrumental Analyzer Method
USEPA Method 4	Moisture Content	Field data analysis and reduction
USEPA Method 5B	Particulate Matter (Non-Sulfuric Acid)	Gravimetric Analysis

3.1 STACK GAS VELOCITY AND FLOWRATES (USEPA Methods 1-2)

3.1.1 *Sampling Method*

Stack gas velocity traverses were conducted in accordance with the procedures outlined in USEPA Method 1, "Sample and Velocity Traverses for Stationary Sources," and Method 2, "Determination of Stack Gas Velocity and Volumetric Flowrate." Four

(4) sampling ports were utilized on each unit's exhaust stack, sampling at three (3) points per port for a total of twelve (12) points. Velocity traverses were conducted simultaneously with the particulate sampling. See Figure 2 for a diagram of the traverse/sampling points used.

Cyclonic flow checks were performed on each stack during the annual flow monitor certification RATAs. Testing at the sampling location demonstrated that no cyclonic flow was present. Additionally, RWDI performed cyclonic flow checks at the beginning of the test event. None of the sampling points demonstrated angles of flow greater than +/-10° from the of 0° reference.

3.1.2 *Method 2 Sampling Equipment*

The EPA Method 2 sampling equipment consisted of a 0-10" incline manometer, S-type Pitot tube (C_p = 0.84) and a Type-K calibrated thermocouple.

3.2 OXYGEN & CARBON DIOXIDE (USEPA Method 3A)

3.2.1 *Sampling Method*

Oxygen (O_2) and carbon dioxide (CO_2) emissions were evaluated using USEPA Method 3A, "Determination of Oxygen and Carbon Dioxide Concentrations in Emissions from Stationary Sources (Instrumental Analyzer Procedure)". The analyzers utilize paramagnetic sensors.

3.2.2 *O_2/CO_2 Sampling Train*

The EPA Method 3A sampling system (Figure 3) consisted of the following:

(1) PTFE sampling line (collecting dry gas sample from the DGM exhaust)
(2) Sample pump
(3) Servomex 1400 O_2/CO_2 gas analyzer
(4) Data acquisition software
(5) Appropriate USEPA Protocol 1 calibration gases

3.2.3 *Sampling Train Calibration*

The O_2 and CO_2 analyzers were calibrated per procedures outlined in USEPA Methods 3A. Zero, span, and mid-range calibration gases were introduced directly into the analyzer to verify the instruments linearity. At the conclusion of each test period, upscale and downscale gases were introduced into the sample system to determine instrument drift and system bias.

3.3 MOISTURE DETERMINATION (USEPA Method 4)

3.3.1 *Sampling Method*

Determination of the moisture content of the exhaust gas was performed using USEPA Method 4, "Determination of Moisture Content in Stack Gases". The moisture was collected in glass impingers as a component of the Method 5B sampling train, and the percentage of water was then derived from calculations outlined in USEPA Method 4.

3.4 PARTICULATE MATTER (USEPA Method 5B)

3.4.1 *Filterable Particulate Sampling Method*

USEPA Method 5B, "Determination of Non-Sulfuric Acid Particulate Emissions from Stationary Sources" was used to measure the filterable (front-half) particulate emissions (see Figure 4 for a schematic of the sampling train). Fifteen (15), 60-minute test runs were conducted.

The Method 5B modular isokinetic stack sampling system consisted of the following:

(1) PTFE coated stainless-steel button-hook nozzle
(2) Heated glass-lined probe
(3) Heated 3" glass filter holder with a quartz filter (Maintained at a temperature of 320 $\pm$ 25 °F)
(4) Set of impingers for the collection of condensate for moisture determination
(5) Length of sample line
(6) Environmental Supply® control case equipped with a pump, dry gas meter, and calibrated orifice.

The quartz filters used in the sampling were initially baked for 3 hours at 320 °F, desiccated for 24 hours and weighed to a constant weight as described in Method 5B to obtain the initial tare weight.

After completion of the final leak test for each test run, the filter was recovered, and the probe, nozzle and the front half of the filter holder assembly were brushed and rinsed with acetone. The acetone rinses were collected in a pre-cleaned sample container. The 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.

At the laboratory, the acetone rinses were transferred to clean pre-weighed beakers, evaporated to dryness at ambient temperature and pressure. The beakers and filters were baked for 6 hours at 320 °F, desiccated for 24 hours and weighed to a constant

weight (within 0.5 mg). The data sheets containing the initial and final weights on the filters and beakers can be found in Appendix C.

Collected field blanks consisted of a blank filter and acetone solution blank. The acetone blank was collected from the rinse bottle used in sample recovery. The blank filter and acetone were collected and analyzed following the same procedures used to recover and analyze the field samples. Field data sheets for the Method 5B sampling can be found in Appendix B.

3.4.2 *Quality Control and Assurance*

All sampling and analytical equipment was calibrated per the guidelines referenced in EPA Method 5B. All Method 1-4, and 5B calibration data is in Appendix D.

3.4.3 *Data Reduction*

The filterable PM emissions data collected during the testing were calculated and reported as mg/acm @ 160°C for comparison to the PM CEMS.

4.0 OPERATING PARAMETERS

The test program included the collection of PM CEMS emission data and Load during each PM emissions test. Data collected during the testing is presented in Appendix E.

5.0 DISCUSSION OF RESULTS

Table 1 presents the Reference Method particulate emission testing results (RM PM), raw particulate matter continuous emissions monitoring system (PM CEMS) results, unit load, and PM range designation for each test. Particulate emissions are presented in milligram per actual cubic meter corrected to 160°C (mg/acm).

In order to pass an RCA, All of the following criteria must be met: Procedure 2 10.4(5)(i-ii).

i) For all 12 data points, the PM CEMS Correlation value can be no greater that the greatest PM CEMS Correlation value used to develop your correlation curve.

ii) At least 75% of a minimum number of 12 sets of PM CEMS and Reference Method measurements must fall within the same specified area on a graph of the correlation regression line. The specified area on the graph of the correlation regression line is defined by two lines parallel to the correlation regression line, offset at a distance of ±25% of the numerical emission limit value from the correlation regression line.

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The UNIT 2 RCA testing did not meet the required criteria. Section 10.6 of Procedure 2 outlines actions to be taken if an RCA does not meet passing criteria. After performing statistical analysis of the data, it was determined the data does not meet the criteria for developing a new curve using procedures in PS-11. The PM CEM remains "Out of Service" until further testing is performed.

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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RESULTS TABLES
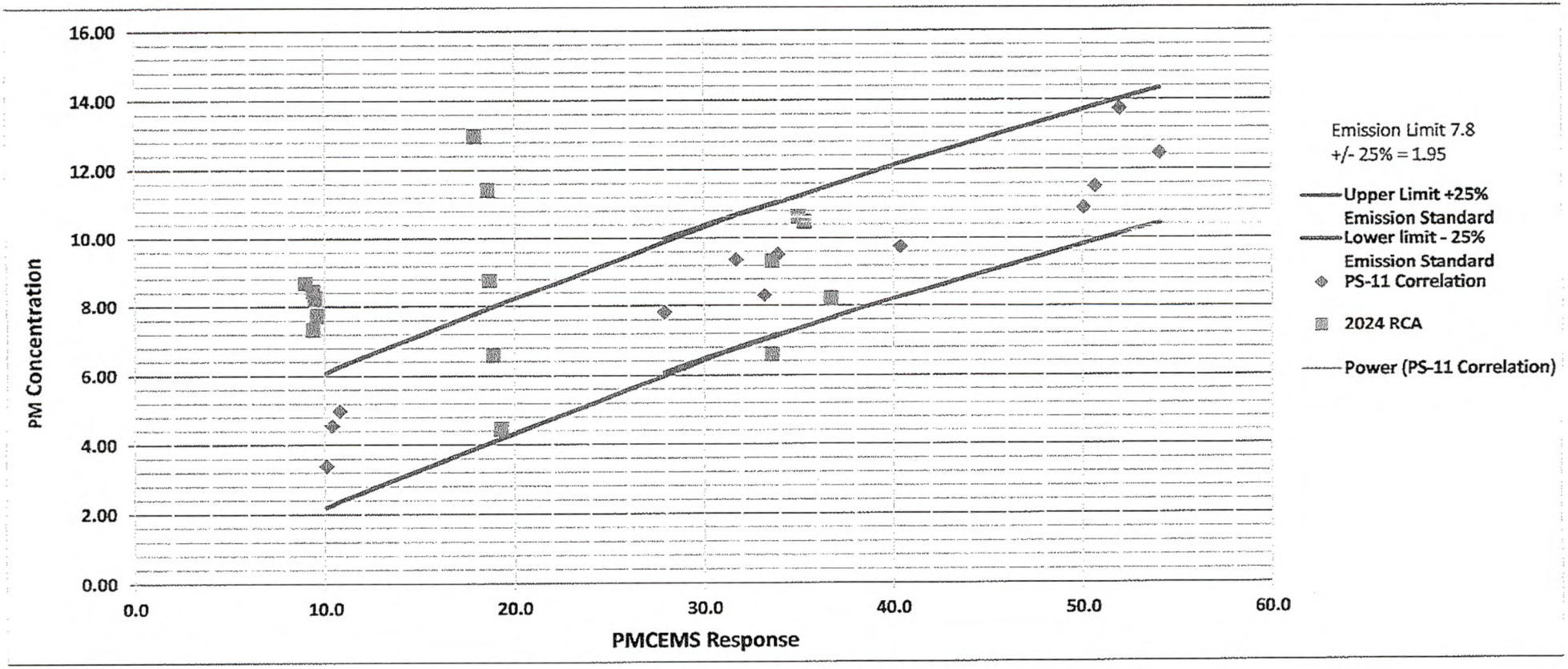
TABLE No. 2
MONROE POWER PLANT
UNIT 2
PM CEMS RCA
SUMMARY GRAPH
October 16-21, 2024