



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

**Lansing Board of Water and Light
Erickson Station
Unit 1 Stack
Lansing, Michigan
March 15, 2018**

**Report Submittal Date
April 10, 2018**

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Mostardi Platt

Project No. M181204A

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 Erickson Station on the Unit 1 Stack in Lansing, Michigan on March 15, 2018. This report summarizes the results of the test program and test methods used.

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

TEST INFORMATION		
Test Location	Test Date	Test Parameters
Unit 1 Stack	March 15, 2018	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	LEE Emission Limits	Emission Rates
Unit 1 Stack	FPM	≤0.030 lb/mmBtu	≤0.015 lb/mmBtu	0.0072 lb/mmBtu
	HCl	≤0.002 lb/mmBtu	≤0.001 lb/mmBtu	0.0008 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 analyzed by Mostardi Platt. 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) trista.gregorski@lbwl.com
Test Facility	Lansing Board of Water and Light Erickson Station 3725 South Canal Road Lansing, Michigan 48917	
Testing Company Representative	Mostardi Platt 888 Industrial Drive Elmhurst, Illinois 60126	Mr. Christopher Eldridge Project Manager (630) 993-2100 (phone) celdridge@mp-mail.com

The test crew consisted of Messrs. B. Garcia, C. Buglio, J. Kukla, T. Schmidt, and C. Eldridge of Mostardi Platt.

APR 27 2018

AIR QUALITY DIVISION

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 1 Stack	7.9	11.3	FPM, HCl	12

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. An 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 at the Elmhurst, Illinois laboratory of Mostardi Platt. 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: Erickson Station
Test Location: Unit 1 Stack
Test Method: 5 MATS

	Source Condition	Normal	Normal	Normal
	Date	3/15/18	3/15/18	3/15/18
	Start Time	8:50	11:15	13:50
	End Time	11:00	13:24	15:59
	Run 1	Run 2	Run 3	Average
Stack Conditions				
Average Gas Temperature, °F	318.1	317.8	318.5	318.1
Flue Gas Moisture, percent by volume	9.2%	10.4%	10.3%	10.0%
Average Flue Pressure, in. Hg	28.47	28.47	28.47	28.47
Gas Sample Volume, dscf	90.123	92.051	91.570	91.248
Average Gas Velocity, ft/sec	51.176	51.565	50.946	51.229
Gas Volumetric Flow Rate, acfm	696,961	702,258	693,824	697,681
Gas Volumetric Flow Rate, dscfm	408,374	406,439	401,420	405,411
Gas Volumetric Flow Rate, scfm	449,949	453,563	447,732	450,415
Average %CO ₂ by volume, dry basis	13.7	13.7	13.2	13.5
Average %O ₂ by volume, dry basis	5.7	5.7	6.0	5.8
Isokinetic Variance	98.4	101.0	101.7	100.4
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	0.01953	0.02683	0.01990	0.02209
mg/dscm	7.653	10.293	7.675	8.5402
grains/acf	0.0020	0.0026	0.0019	0.0022
grains/dscf	0.0033	0.0045	0.0034	0.0037
lb/hr	11.704	15.668	11.538	12.970
lb/mmBtu (Standard Fd Factor)	0.0064	0.0087	0.0066	0.0072

Client: Lansing Board of Water and Light
 Facility: Erickson Station
 Test Location: Unit 1 Stack
 Test Method: 26A

	Source Condition	Normal	Normal	Normal	
	Date	3/15/18	3/15/18	3/15/18	
	Start Time	8:50	11:15	13:50	
	End Time	10:35	13:00	15:35	
		Run 1	Run 2	Run 3	Average
Stack Conditions					
Average Gas Temperature, °F		315.3	316.8	316.8	316.3
Flue Gas Moisture, percent by volume		10.3%	11.3%	10.4%	10.7%
Average Flue Pressure, in. Hg		28.47	28.47	28.47	28.47
Gas Sample Volume, dscf		72.598	72.559	71.866	72.341
Average Gas Velocity, ft/sec		51.616	51.950	51.703	51.756
Gas Volumetric Flow Rate, acfm		702,943	707,499	704,128	704,857
Gas Volumetric Flow Rate, dscfm		408,390	405,987	408,023	407,467
Gas Volumetric Flow Rate, scfm		455,445	457,561	455,381	456,129
Average %CO ₂ by volume, dry basis		13.7	13.7	13.2	13.5
Average %O ₂ by volume, dry basis		5.7	5.7	6.0	5.8
Isokinetic Variance		102.7	103.3	101.8	102.6
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		1702.91	2007.56	1902.44	1870.97
ppm		0.55	0.64	0.62	0.60
mg/dscm		0.83	0.98	0.93	0.91
lb/hr		1.2671	1.4858	1.4287	1.3939
lb/mmBtu (Standard Fd Factor)		0.0007	0.0008	0.0008	0.0008

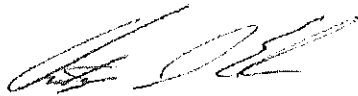
4.0 CERTIFICATION

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



Christopher S. Eldridge

Program Manager



Scott W. Banach

Quality Assurance