

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 August 3, 2021. 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 Dates	Test Parameters
Unit 1 Stack	August 3, 2021	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	0.0029 lb/mmBtu
	HCl	≤0.002 lb/mmBtu	≤0.001 lb/mmBtu	0.0010 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 were 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	Mr. Nathan Hude Environmental Regulatory Compliance (517) 490-3069 (cell phone) nathan.hude@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. Stuart Burton Project Manager 630-993-2100 (phone) sburton@mp-mail.com

The test crew consisted of Messrs. N. Colangelo, P. Coleman, K. Beckham, T. Long, S Burton of Mostardi Platt.

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	8/3/21	8/3/21	8/3/21	
	Start Time	10:40	13:27	16:05	
	End Time	12:57	15:42	18:20	
		Run 1	Run 2	Run 3	Average
Stack Conditions					
Average Gas Temperature, °F		325.7	330.2	335.0	330.3
Flue Gas Moisture, percent by volume		11.3%	11.4%	12.5%	11.7%
Average Flue Pressure, in. Hg		28.82	28.82	28.82	28.82
Gas Sample Volume, dscf		89.735	90.971	89.768	90.158
Average Gas Velocity, ft/sec		46.846	47.668	47.962	47.492
Gas Volumetric Flow Rate, acfm		637,988	649,177	653,188	646,784
Gas Volumetric Flow Rate, dscfm		366,294	370,299	365,618	367,404
Gas Volumetric Flow Rate, scfm		412,917	417,788	417,836	416,180
Average %CO ₂ by volume, dry basis		14.3	14.7	14.8	14.6
Average %O ₂ by volume, dry basis		4.9	4.8	4.8	4.8
Isokinetic Variance		101.8	102.1	102.0	102.0
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		0.00940	0.00919	0.00941	0.00933
mg/dscm		3.699	3.568	3.702	3.656
mg/wscm		3.281	3.161	3.239	3.227
grains/acf		0.0009	0.0009	0.0009	0.0009
grains/dscf		0.0016	0.0016	0.0016	0.0016
lb/mmBtu (Standard Fd Factor)		0.0030	0.0028	0.0029	0.0029

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

Source Condition	Normal	Normal	Normal	
Date	8/3/21	8/3/21	8/3/21	
Start Time	10:40	13:27	16:05	
End Time	12:37	15:19	17:55	
	Run 1	Run 2	Run 3	Average
Stack Conditions				
Average Gas Temperature, °F	325.4	330.4	333.8	329.9
Flue Gas Moisture, percent by volume	10.1%	11.5%	11.2%	10.9%
Average Flue Pressure, in. Hg	28.82	28.82	28.82	28.82
Gas Sample Volume, dscf	64.552	64.006	64.480	64.346
Average Gas Velocity, ft/sec	47.854	47.837	48.370	48.020
Gas Volumetric Flow Rate, acfm	651,710	651,481	658,737	653,976
Gas Volumetric Flow Rate, dscfm	379,406	370,789	374,922	375,039
Gas Volumetric Flow Rate, scfm	421,955	419,138	422,027	421,040
Average %CO ₂ by volume, dry basis	14.3	14.7	14.8	14.6
Average %O ₂ by volume, dry basis	4.9	4.8	4.8	4.8
Isokinetic Variance	99.0	100.5	100.1	99.9
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	2503.00	1967.00	2583.00	2351.00
ppm	0.90	0.72	0.93	0.85
mg/dscm	1.37	1.09	1.41	1.29
lb/hr	1.946	1.507	1.987	1.813
lb/mmBtu (Standard Fd Factor)	0.0011	0.0009	0.0011	0.0010

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.

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



Stuart L. Burton

Program Manager



Scott W. Banach

Quality Assurance

APPENDICES

RECEIVED
SEP 21 2011
AIR QUALITY DIVISION

Appendix A - Plant Operating Data

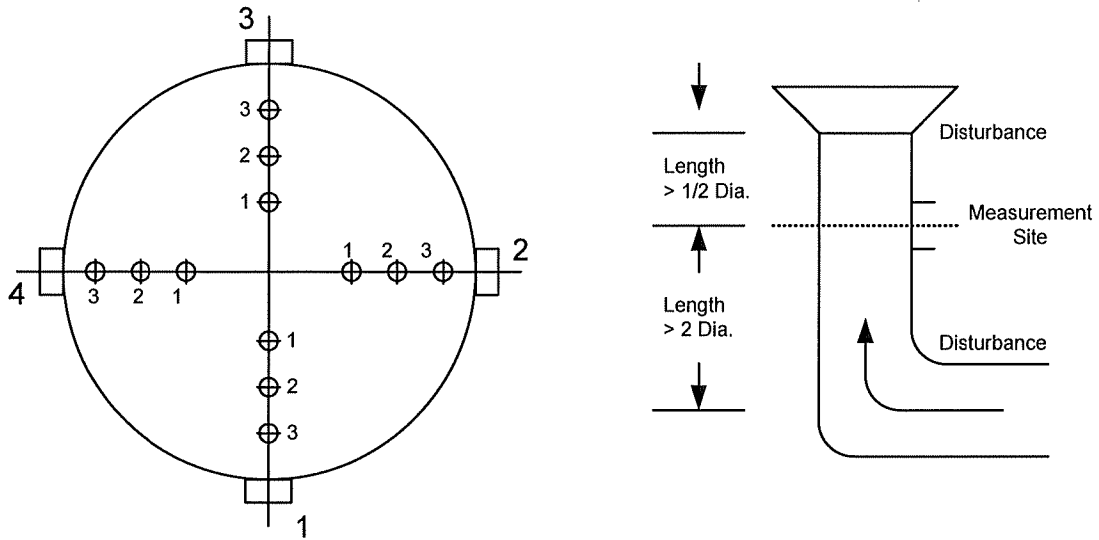
MATS Run1	
Date/Time	UNIT01 MW Value
08/03/2021 10:30	164
08/03/2021 10:45	164
08/03/2021 11:00	164
08/03/2021 11:15	164
08/03/2021 11:30	164
08/03/2021 11:45	164
08/03/2021 12:00	164
08/03/2021 12:15	164
08/03/2021 12:30	164
08/03/2021 12:45	164
08/03/2021 13:00	164

MATS Run2	
Date/Time	UNIT01 MW Value
08/03/2021 13:15	164
08/03/2021 13:30	164
08/03/2021 13:45	164
08/03/2021 14:00	164
08/03/2021 14:15	164
08/03/2021 14:30	164
08/03/2021 14:45	164
08/03/2021 15:00	164
08/03/2021 15:15	164
08/03/2021 15:30	164
08/03/2021 15:45	164

MATS Run3	
Date/Time	UNIT01 MW Value
08/03/2021 16:00	164
08/03/2021 16:15	164
08/03/2021 16:30	164
08/03/2021 16:45	164
08/03/2021 17:00	164
08/03/2021 17:15	163
08/03/2021 17:30	164
08/03/2021 17:45	164
08/03/2021 18:00	164
08/03/2021 18:15	164
08/03/2021 18:30	164

Appendix B - Test Section Diagram

EQUAL AREA TRAVERSE FOR ROUND DUCTS



Job: Lansing Board of Water and Light
Erickson Station
Lansing, Michigan

Date: August 3, 2021

Test Location: Unit 1 Stack

Stack Diameter: 17.0 feet

Stack Area: 226.980 feet squared

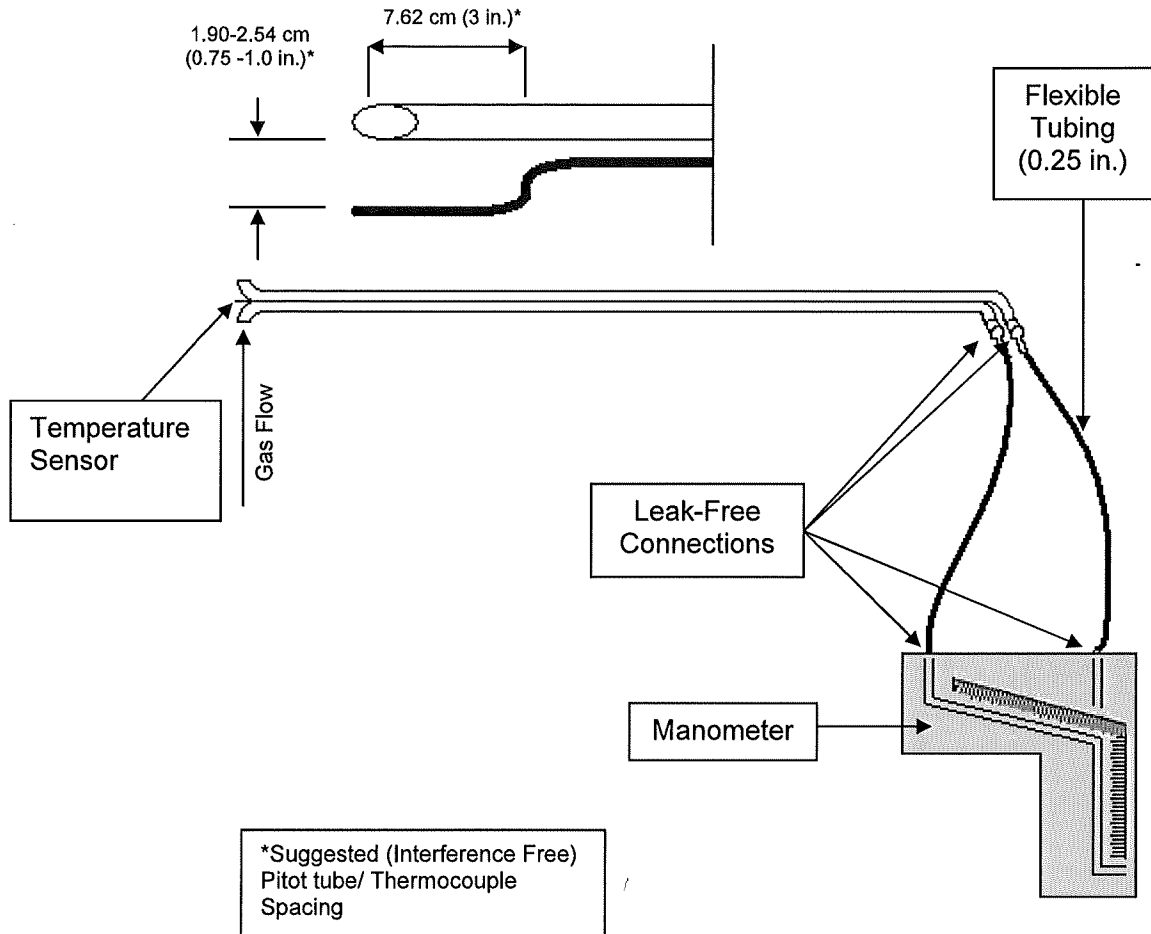
No. Points Across Diameter: 3

No. of Ports: 4

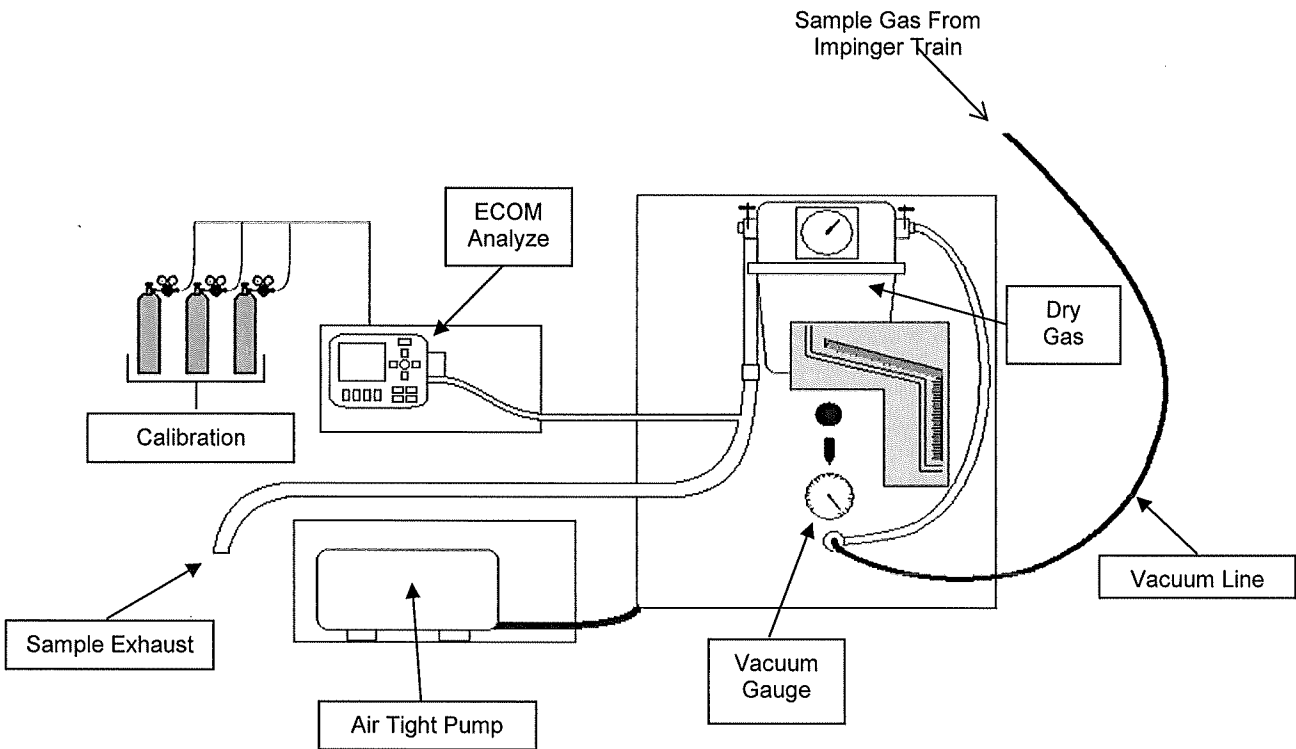
Port Length: 78 inches

Appendix C - Sample Train Diagrams

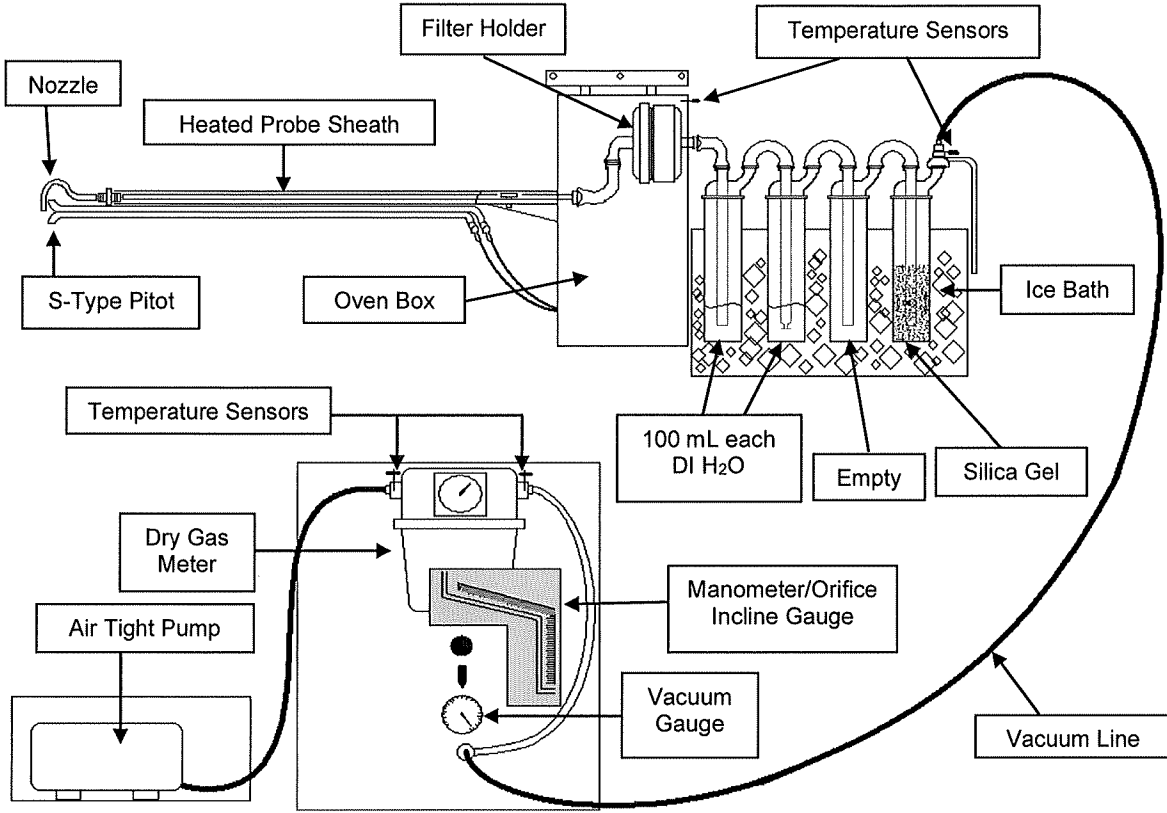
USEPA Method 2 – Type S Pitot Tube Manometer Assembly



USEPA Method 3A - Integrated Oxygen/Carbon Dioxide Sample Train Diagram Utilizing ECOM To Measure from Sample Exhaust



USEPA Method 5- Particulate Matter Sample Train Diagram



USEPA Method 26A – HCl Sample Train Diagram

