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Relative Accuracy Test Audit
Test Report

Lansing Board of Water and Light
Delta Energy Park Facility
EUCTGSC1 Stack
Lansing, Michigan 48917
February 6, 2024

Report Submittal Date
February 16, 2024

Project No. M233603C

Corporate Headquarters
888 Industrial Drive
Elmhurst, Illinois 60126
630-993-2100

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1.0 EXECUTIVE SUMMARY

Mostardi Platt conducted a Continuous Emissions Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) test program for Lansing Board of Water and Light at the Delta Energy Park Facility in Lansing, Michigan, on the EUCTGSC1 Stack on February 6, 2024. This report summarizes the results of the test program and test methods used in accordance with the Mostardi Platt Protocol M233603C dated September 26, 2023. Mostardi Platt is a self-certified air emissions testing body (AETB). A copy of Mostardi Platt's self-certification can be found in Appendix A. Mostardi Platt is a self-certified air emissions testing body (AETB). A copy of Mostardi Platt's self-certification can be found in Appendix A.

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

TEST INFORMATION		
Test Location	**Test Date**	**Test Parameters**
EUCTGSC1 Stack	February 6, 2024	Oxygen (O_2) and Nitrogen Oxides (NO_X)

The purpose of the test program was to demonstrate the relative accuracies of the EUCTGSC1 Stack O_2 and NO_X analyzers during the specified operating conditions. The test results from this test program indicate that each CEMS component meets the United States Environmental Protection Agency (USEPA) annual performance specification for relative accuracy as published in 40 Code of Federal Regulations Part 75 (40CFR75).

RATA RESULTS						
Test Location	**Date**	**Parameter**	**Units**	**Relative Accuracy Acceptance Criteria**	**Relative Accuracy (RA)**	**Bias Adjustment Factor (BAF)**
EUCTGSC1 Stack	2/6/24	NO_X	lb/mmBtu	≤ 7.5% of the mean reference value	3.03%	1.026
		O_2	% dry	≤ 7.5% of the mean reference value	0.83%	N/A

The gas cylinders used to perform the RATA are summarized below.

GAS CYLINDER INFORMATION				
Parameter	**Gas Vendor**	**Cylinder Serial Number**	**Cylinder Value**	**Expiration Date**
NO_X	Airgas	CC349243	0 ppm	1/24/2030
NO_X	Airgas	CC422948	25.46 ppm	8/15/2026
NO_X	Airgas	CC420531	44.93 ppm	8/14/2026
O_2	Airgas	CC422948	0%	8/15/2026
O_2	Airgas	CC349243	11.75%	1/24/2030
O_2	Airgas	CC407478	21.93%	7/7/2030

No deviations, additions, or exclusions from the test protocol, test methods, the Mostardi Platt Quality Manual, or the ASTM D7036-12 occurred. The specific test conditions encountered did not interfere with the collection of the data.

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	Nathan Hude Environmental Regulatory Compliance (517) 702-6170 (cell phone) nathan.hude@lbwl.com
Test Facility	Lansing Board of Water and Light Delta Energy Park Facility 3725 South Canal Road Lansing, Michigan 48917 Permit to Install 74-18C	
Testing Company Supervisor	Mostardi Platt 888 Industrial Drive Elmhurst, Illinois 60126	Mr. Timothy R. Yanowsky Test Supervisor 630-993-2100 (phone) tyanowsky@mp-mail.com
Testing Company Personnel		Mr. Jeff Gross Test Technician

Copies of the QI certifications for test personnel are included in Appendix B.

2.0 TEST METHODOLOGY

Emission testing was conducted following the United States Environmental Protection Agency (USEPA) methods specified in 40CFR75 and 40CFR60, Appendix A in addition to the Mostardi Platt Quality Manual and the test protocol. Schematics of the test section diagrams and sampling trains used are included in Appendix C and D respectively. Calculation and nomenclature are included in Appendix E. Copies of analyzer print-outs for each test run are included in Appendix F. CEM data and process data as provided by Lansing Board of Water and Light are included in Appendix G.

The following methodologies were used during the test program:

Method 3A Oxygen (O_2) Determination

Stack gas O_2 concentrations were determined in accordance with USEPA Method 3A, 40CFR60, Appendix A. An O_2 analyzer was used to determine the O_2 concentrations in the manner specified in the Method. The instrument has a paramagnetic detector and the O_2 operates in the nominal range of 0% to 25% with the specific range determined by the high-level calibration gas of 21.93%. High-range calibrations were performed using USEPA Protocol gas. Zero nitrogen (a low ppm pollutant in balance nitrogen calibration gases) was introduced during other instrument calibrations to check instrument zero. High- and a mid-range % O_2 levels in balance nitrogen were also introduced. Zero and mid-range calibrations were performed using USEPA Protocol gas after each test run. Copies of the gas cylinder certifications are found in Appendix I. This testing met the performance specifications as outlined in the Method.

Method 7E Nitrogen Oxides (NO_X) Determination

Stack gas NO_X concentrations and emission rates were determined in accordance with USEPA Method 7E, 40CFR60, Appendix A. A Thermo Scientific Model 42iQSL Chemiluminescence Nitrogen Oxides Analyzer was used to determine nitrogen oxides concentrations, in the manner specified in the Method. The instrument operated in the nominal range of 0 ppm to 50 ppm with the specific range determined by the high-level span calibration gas of 44.93 ppm.

The Model 42iQSL High Level is based on the principle that nitric oxide (NO) and ozone (O_3) react to produce a characteristic luminescence with an intensity linearly proportional to the NO concentration. Infrared light emission results when electronically excited nitrogen dioxide (NO_2) molecules decay to lower energy states. Specifically,

$$NO+O_3 \rightarrow NO_2+O_2+h\upsilon$$

NO_2 must first be transformed into NO before it can be measured using the chemiluminescent reaction. NO_2 is converted to NO by a molybdenum NO_2-to-NO converter heated to about 337°C. The flue gas air sample is drawn into the Model 42iQSL High Level through the sample bulkhead. The sample flows through a particulate filter, a capillary, and then to the mode solenoid valve. The solenoid valve routes the sample either straight to the reaction chamber (NO mode) or through the NO_2-to-NO converter and then to the reaction chamber (NOx mode).

Dry air enters the Model 42iQSL High Level through the dry air bulkhead, through a flow sensor, and then through a silent discharge ozonator. The ozonator generates the necessary ozone concentration needed for the chemiluminescent reaction. The ozone reacts with the NO in the ambient air sample to produce electronically excited NO_2 molecules. A photomultiplier tube (PMT) housed in a thermoelectric cooler detects the NO_2 luminescence.

The NO and NO_X concentrations calculated in the NO and NO_X modes are stored in memory. The difference between the concentrations is used to calculate the NO_2 concentration. The Model 42iQSL High Level outputs NO, NO_2, and NO_X concentrations to both the front panel display and the analog outputs.

Stack gas was delivered to the analyzer via a Teflon® sampling line, heated to a minimum temperature of 250°F. Excess moisture in the Stack gas was removed using a refrigerated condenser. The entire system was calibrated in accordance with the Method, using USEPA Protocol gases introduced at the probe, before and after each test run. This testing met the performance specifications as outlined in the Method.

A list of calibration gases used and the results of all calibration and other required quality assurance checks are found in Appendix H. Copies of the gas cylinder certifications are found in Appendix I. The NO_2 to NO converter test can be found in Appendix J. This testing met the performance specifications as outlined in the Method.

3.0 TEST RESULT SUMMARIES

Client: Lansing Board of Water and Light
Facility: Delta Energy Park
Project #: M233603
Fuel Type: Natural Gas

Location: EUCTGSC1
Date: 2/6/24
Test Method: 7E, 3A
Fuel Factor: 8710

O2 based NOx lb/mmBtu RATA

CEM Analyzer Information

NO_x Monitor/Model:	Thermo Scientific 42iQLS	**NO_x Serial # :**	12218718717
O2 Monitor/Model:	Thermo Scientific 42iQLS	**O2 Serial # :**	12218718717

1=accept 0=reject	Test Run	Test Date	Start Time	End Time	RM NO_x lb/MMBtu	CEM NO_x lb/MMBtu	(RM-CEM) Difference (di)	(RM-CEM) Difference^2 (di^2)
1	1	02/06/24	09:44	10:04	0.070	0.068	0.002	0.000004
1	2	02/06/24	10:16	10:36	0.070	0.068	0.002	0.000004
1	3	02/06/24	10:52	11:12	0.069	0.068	0.001	0.000001
1	4	02/06/24	11:29	11:49	0.071	0.069	0.002	0.000004
1	5	02/06/24	12:05	12:25	0.070	0.069	0.001	0.000001
1	6	02/06/24	12:46	13:06	0.071	0.069	0.002	0.000004
1	7	02/06/24	13:25	13:45	0.070	0.068	0.002	0.000004
1	8	02/06/24	14:11	14:31	0.069	0.067	0.002	0.000004
1	9	02/06/24	14:46	15:06	0.069	0.067	0.002	0.000004
0	10	02/06/24	15:21	15:41	0.068	0.066	0.002	0.000004

n	**9**	
t(0.025)	**2.306**	
Mean Reference Method Value	**0.070**	**RM avg**
Mean CEM Value	**0.068**	**CEM avg**
Sum of Differences	**0.016**	**di**
Mean Difference	**0.002**	**d**
Sum of Differences Squared	**0.000**	**di^2**
Standard Deviation	**0.000**	**sd**
Confidence Coefficient 2.5% Error (1-tail)	**0.000**	**cc**
Relative Accuracy	**3.03**	**RA**
Bias Adjustment Factor	**1.026**	**BAF**

Client: Lansing Board of Water and Light **Location:** EUCTGSC1
Facility: Delta Energy Park **Date:** 2/6/24
Project #: M233603 **Test Method:** 3A

O_2 % (dry) RATA

CEM Analyzer Information

O_2 Monitor/Model:			Thermo Scientific 42iQLS		O_2 Serial # :		12218718717	
1=accept 0=reject	Test Run	Test Date	Start Time	End Time	RM O_2 % (dry)	CEM O_2 % (dry)	(RM-CEM) Difference (di)	(RM-CEM) Difference^2 (di^2)
1	1	02/06/24	09:44	10:04	13.8	13.9	-0.1	0.01
1	2	02/06/24	10:16	10:36	13.8	13.9	-0.1	0.01
1	3	02/06/24	10:52	11:12	13.8	13.9	-0.1	0.01
1	4	02/06/24	11:29	11:49	13.8	13.9	-0.1	0.01
1	5	02/06/24	12:05	12:25	13.8	13.9	-0.1	0.01
1	6	02/06/24	12:46	13:06	13.7	13.8	-0.1	0.01
1	7	02/06/24	13:25	13:45	13.8	13.8	0.0	0.00
0	8	02/06/24	14:11	14:31	13.7	13.9	-0.2	0.04
1	9	02/06/24	14:46	15:06	13.8	13.9	-0.1	0.01
1	10	02/06/24	15:21	15:41	13.8	13.9	-0.1	0.01
				n	**9**			
				t(0.025)	**2.306**			
				Mean Reference Method Value	**13.789**		**RM avg**	
				Mean CEM Value	**13.878**		**CEM avg**	
				Sum of Differences	**-0.800**		**di**	
				Mean Difference	**-0.089**		**d**	
				Sum of Differences Squared	**0.080**		**di^2**	
				Standard Deviation	**0.033**		**sd**	
				Confidence Coefficient 2.5% Error (1-tail)	**0.026**		**cc**	
				Relative Accuracy	**0.83**		**RA**	

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 the program 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. The test program was performed in accordance with the test protocol, test methods, the Mostardi Platt Quality Manual, and the ASTM D7036-12, as applicable.

MOSTARDI PLATT

Timothy E Yanowsky — Program Manager

Scott W. Banach — Quality Assurance

APPENDICES

Appendix A - Company AETB Certification

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March 23, 2012

Effective immediately, Mostardi Platt self-certifies that all Part 75 test projects conform to the ASTM D 7036-04 Standard Practice. The following contact information is provided as required by the Standard:

Mostardi Platt
888 Industrial Drive
Elmhurst, Illinois 60126

630-993-2100

tplatt@mp-mail.com

Also, attached is a list of each Qualified Individual (QI) with the type of exam (e.g., Group I, II, III IV and/or V), the date the exam was taken and the name and email address of the exam provider.

Should you have any questions or need additional information, please contact Thomas Platt, P.E. at 630-993-2683.

Approved:

By: _____
Robert J. Platt
Chief Executive Officer

QSTI AETB Import Data

QI Last Name [REQUIRED]	QI First Name [REQUIRED]	QI Middle Initial	AETB Name [REQUIRED]	AETB Phone Number [REQUIRED]	AETB Email [REQUIRED]	Exam Date mm/dd/yyyy [REQUIRED]	Exam Provider Name [REQUIRED]	Exam Provider Email [REQUIRED]	Comment
Beckham	Kenneth	J	Mostard Platt	630-993-2100	tplatt@mp-mail.com	5/18/2023	Source Evaluation Society	qstiprogram@gmail.com	Group V (Part 75)
Benninghoff	Aaron	W	Mostard Platt	630-993-2100	tplatt@mp-mail.com	9/8/2023	Source Evaluation Society	qstiprogram@gmail.com	Group V (Part 75)
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Kossack	Daniel	J	Mostard Platt	630-993-2100	tplatt@mp-mail.com	11/11/2021	Source Evaluation Society	qstiprogram@gmail.com	Group V (Part 75)
Kukla	Joshua	R	Mostard Platt	630-993-2100	tplatt@mp-mail.com	1/4/2019	Source Evaluation Society	qstiprogram@gmail.com	Group V (Part 75)
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Simon	Ryan	K	Mostard Platt	630-993-2100	tplatt@mp-mail.com	1/19/2023	Source Evaluation Society	qstiprogram@gmail.com	Group V (Part 75)
Sollars	Richard	J	Mostard Platt	630-993-2100	tplatt@mp-mail.com	7/28/2023	Source Evaluation Society	qstiprogram@gmail.com	Group V (Part 75)
Sorce	Angelo	M	Mostard Platt	630-993-2100	tplatt@mp-mail.com	2/18/2022	Source Evaluation Society	qstiprogram@gmail.com	Group V (Part 75)
Trezak	Christopher	S	Mostard Platt	630-993-2100	tplatt@mp-mail.com	4/14/2020	Source Evaluation Society	qstiprogram@gmail.com	Group V (Part 75)

Appendix B - QI Certification(s) for Field Personnel

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Qualified Individual

Jeffrey M. Gross

Has satisfactorily completed the requirements of

ASTM D 7036 – 04, Section 8.3

Standard Practice for Competence of Air Emission Testing Bodies

Examinations provided by Source Evaluation Society: www.sesnews.org, (919) 544-6338

All Part 75 test methods, under my supervision, shall conform to the company's Quality Manual and to this practice, in all respects.

Passed Group V on 1/19/2024

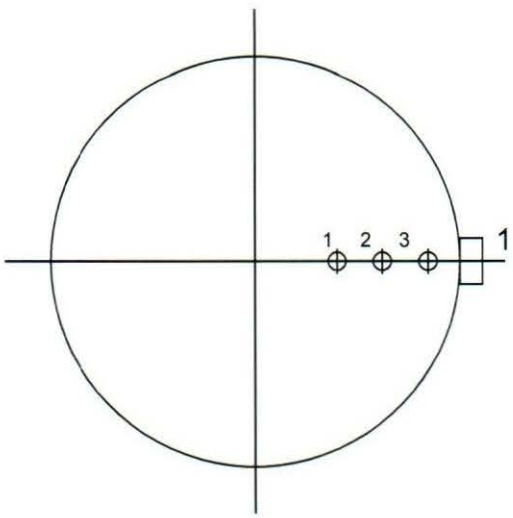
Expiration Date: Group V on 1/19/2029

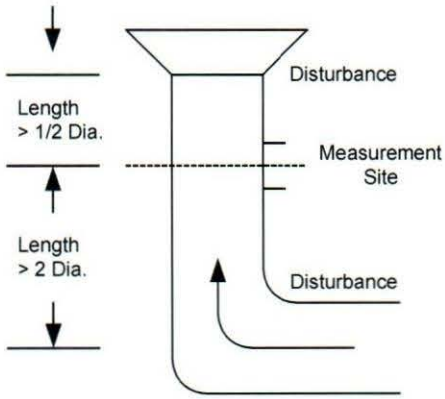
Signature: _____ **Date:** 1/22/2024

Quality Manager: _____ **Technical Director:** _____

Appendix C - Test Section Diagram

GASEOUS TRAVERSE FOR ROUND DUCTS





Job: Lansing Board of Water and Light
Delta Energy Park Facility
Lansing, Michigan

Date: February 6, 2024

Test Location: EUCTGSC1 Bypass Stack

Stack Diameter: 11.901 Feet

Stack Area: 111.24 Square Feet

No. Sample Points: 3

Appendix D - Sample Train Diagram

USEPA Methods 3A and 7E Extractive Gaseous Sampling Diagram