

Pontiac Engineering Center  
850 Glenwood Avenue  
Pontiac, MI 48340-2295

July 15, 2022

Joyce Zhu  
Michigan Department of Environment, Great Lakes, And Energy  
Air Quality Division  
27700 Donald Court  
Warren, Michigan 48092-2793

**RE: NOx Emission Test Report: Engine Dynamometer NOx Emission Factor Testing for FG-TESTCELLS Special Condition V.2. and FG-RACINGTCS Special Condition V.1.**

*Pontiac Engineering Center/Permit Number MI-ROP-B4032-2020*

Dear Joyce:

General Motors is pleased to provide the attached Emission Test Report that details sampling, analytical analysis and test results as part of the compliance testing the Pontiac Engineering Center located in Pontiac, Michigan. Emission Testing was performed by Montrose Air Quality Services, LLC (MAQS) on May 16, 2022, and May 17, 2022. The average Wing 3 annual fuel flow rate was used to determine the scaled-up Wing 3 NOx emission rate. The Racing Emission Test was performed on the exhaust of a single racing dynamometer and includes the evaluation of oxides of nitrogen (NOx), and oxygen (O<sub>2</sub>) from a high-performance engine.

Based on the test results, NOx emission rates are below permit limits for Wing 3 (24.5 lb/hr) and Racing (73.9 lb/hr). The Emission Test Report is included.

If you have any questions, please contact me at either [charles.kessler@gm.com](mailto:charles.kessler@gm.com) or 248.883.2629

Sincerely,

Charles Kessler  
Environmental Engineer

Enclosure

CC: Jeremy Howe, EGLE-AQD  
Iranna Konanahalli, EGLE-AQD  
Jessica Alderton, GM  
Rachel Gribas, GM

B4032\_test\_20220517





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RENEWABLE OPERATING PERMIT  
REPORT CERTIFICATION

AIR QUALITY DIVISION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environment, Great Lakes, and Energy, Air Quality Division upon request.

Source Name General Motors LLC - Pontiac Engineering Center County Oakland

Source Address 850 Glenwood Avenue City Pontiac

AQD Source ID (SRN) B4032 ROP No. MI-PTI-B4032-2020 ROP Section No. \_\_\_\_\_

Please check the appropriate box(es):

**Annual Compliance Certification (Pursuant to Rule 213(4)(c))**

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

1. During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.

2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, EXCEPT for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

**Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))**

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

1. During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.

2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report(s).

**Other Report Certification**

Reporting period (provide inclusive dates): From 7/15/2022 To 7/15/2022

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

GM LLC Pontiac Engineering Center is submitting the Emission Test Report for


NOx emission testing for FG-RACINGTCS V.1. and FG-TESTCELLS V. Testing/Sampling Condition

2. as Required by MI-ROP-B4032-2020. Enclosed is the final Test Report detailing the

testing, the post test analytical, as well as the final test results.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

<u>Stephen Jenkins</u>	<u>Director, Operations</u>	<u>586-675-0090</u>
Name of Responsible Official (print or type)	Title	Phone Number

	<u>7/15/2022</u>
Signature of Responsible Official	Date

\* Photocopy this form as needed.



**SOURCE TEST REPORT  
2022 COMPLIANCE TESTING  
GENERAL MOTORS, LLC  
PONTIAC ENGINEERING CENTER  
RACING ENGINE AND WING 3 GAS ENGINE  
PONTIAC, MICHIGAN**

Prepared For:

**General Motors**  
800 N Glenwood Ave  
Pontiac, Michigan 48340

For Submittal To:

**Michigan Department of Environment, Great Lakes and Energy**  
525 West Allegan Street  
Lansing, Michigan 48933

Prepared By:

**Montrose Air Quality Services, LLC**  
1371 Brummel Ave  
Elk Grove Village, Illinois 60007

Document Number: **MW023AS-015629-RT-1395**  
Test Dates: **May 17 and 18, 2022**  
Submittal Date: **July 14, 2022**





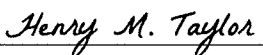
### REVIEW AND CERTIFICATION

All work, calculations, and other activities and tasks performed and presented in this document were carried out by me or under my direction and supervision. I hereby certify that, to the best of my knowledge, Montrose operated in conformance with the requirements of the Montrose Quality Management System and ASTM D7036-04 during this test project.

Signature:  Date: 06 / 21 / 2022

Name: Sean Wheeler, QI Title: Field Project Manager

I have reviewed, technically and editorially, details, calculations, results, conclusions, and other appropriate written materials contained herein. I hereby certify that, to the best of my knowledge, the presented material is authentic, accurate, and conforms to the requirements of the Montrose Quality Management System and ASTM D7036-04.

Signature:  Date: 06 / 21 / 2022

Name: Henry M. Taylor, QSTO Title: Senior Reporting Specialist

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General Motors, LLC– Pontiac, Michigan  
2022 Racing Engine and Wing 3 Gas Engine Compliance Test Report

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## 1.0 INTRODUCTION

### 1.1 SUMMARY OF TEST PROGRAM

General Motors, LLC (GM) contracted Montrose Air Quality Services, LLC (Montrose) to perform compliance emissions test program on the Racing and Wing 3 Gas Engines at their Pontiac Engineering Center facility located in Pontiac, Michigan. The tests were conducted to determine compliance with the emission limits listed in permit number MI-ROP-B4032-2020 issued by Michigan Department of Environment, Great Lakes, and Energy (EGLE).

The specific objectives were to:

- Determine the NO<sub>x</sub> emission rate from the Racing and Wing 3 Gas Engines
- Conduct the test program with a focus on safety

Montrose performed the tests to measure the emission parameters listed in Table 1-1.

**TABLE 1-1  
 SUMMARY OF TEST PROGRAM**

Test Dates	Unit ID/ Source Name	Activity/ Parameters	Test Methods	No. of Runs	Duration (Minutes)
5/17/22	Race Engine (EU-RACINGTC2)	O <sub>2</sub> , CO <sub>2</sub>	EPA 3A	1 / 2	72 / 71
		NO <sub>x</sub>	EPA 7E & 19	1 / 2	72 / 71
5/18/22	Wing 3 Gas Engine (D301)	O <sub>2</sub> , CO <sub>2</sub>	EPA 3A	1 / 1 / 1	68 / 64 / 65
		NO <sub>x</sub>	EPA 7E & 19	1 / 1 / 1	68 / 64 / 65

To simplify this report, a list of Units and Abbreviations is included in Appendix C.1. Throughout this report, chemical nomenclature, acronyms, and reporting units are not defined. Please refer to the list for specific details.

This report presents the test results and supporting data, descriptions of the testing procedures, descriptions of the facility and sampling locations, and a summary of the quality assurance procedures used by Montrose. The average emission test results are summarized and compared to their respective permit limits in Tables 1-2 and 1-3. Detailed results for individual test runs can be found in Section 4.0. All supporting data can be found in the appendices.

The tests were conducted according to Test Protocol Nos. MW023AS-015629-PP-439 dated April 14, 2022 and MW023AS-015629-PP-446 dated April 14, 2022.

**TABLE 1-2  
 SUMMARY OF AVERAGE COMPLIANCE RESULTS -  
 RACE ENGINE  
 MAY 17, 2022**

---

<b>Source ID Number:</b>	EU-RACINGTC2
<b>Sampling Location:</b>	Combined Exhaust Ducts
<b>Engine Dynamometer Fuel Flow (g/sec):</b>	19.096
<b>Combined Nitrogen Oxide Emissions (lb/hr) (as NO<sub>2</sub>):</b>	4.23
<b>Permit Limit – Nitrogen Oxides Emissions (lb/hr) (as NO<sub>2</sub>):</b>	73.90
<b>Emission Results Above Permit Limit:</b>	No
<b>EGLE Renewable Permit Operating Permit No.:</b>	MI-ROP-B4032-2020

---

**TABLE 1-3  
 SUMMARY OF AVERAGE COMPLIANCE RESULTS -  
 WING 3 GAS ENGINE  
 MAY 18, 2022**

---

<b>Source ID Number:</b>	D301
<b>Sampling Location:</b>	Exhaust Duct
<b>Engine Dynamometer Fuel Type Utilized:</b>	Gasoline
<b>Engine Dynamometer Fuel Flow (g/sec):</b>	0.649
<b>Nitrogen Oxide Emissions (lb/hr) (as NO<sub>2</sub>):</b>	0.15
<b>Scaled-Up Wing 3 Nitrogen Oxides Emissions (lb/hr) (as NO<sub>2</sub>)*:</b>	0.18
<b>Permit Limit – Nitrogen Oxides Emissions (lb/hr) (as NO<sub>2</sub>):</b>	24.5
<b>Emission Results Above Permit Limit:</b>	No
<b>EGLE Renewable Permit Operating Permit No.:</b>	MI-ROP-B4032-2020

---

\*The scaled-up lb/hr NO<sub>x</sub> (as NO<sub>2</sub>) emissions for D301 utilizing gasoline is calculated using the facility provided Annual Average Fuel Rate (MMBtu/hr) and the calculated F<sub>d</sub>-Based NO<sub>x</sub> emissions (as NO<sub>2</sub>)

**1.2 KEY PERSONNEL**

A list of project participants is included below:

**Facility Information**

Source Location: General Motors, LLC  
 Pontiac Engineering Center  
 800 N Glenwood Ave.  
 Pontiac, MI 48340  
 Project Contact: Jessica Alderton  
 Role: Senior Environmental Project Engineer  
 Telephone: 586-863-8490  
 Email: jessica.alderton@gm.com  
 Site Contact: Charles Kessler  
 Role: Senior Environmental Engineer  
 Telephone: 248-883-2629  
 Email: Charles.Kessler@gm.com

**Agency Information**

Regulatory Agency: Jeremy Howe  
 Agency Contact: EGLE  
 Telephone: 231-878-6687  
 Email: Howej1@michigan.gov

**Testing Company Information**

Testing Firm: Montrose Air Quality Services, LLC  
 Contact: Sean Wheeler  
 Title: Field Project Manager  
 Telephone: 630-860-4740  
 Email: stwheeler@montrose-env.com

Test personnel and observers are summarized in Table 1-4.

**TABLE 1-4  
 TEST PERSONNEL AND OBSERVERS**

<b>Name</b>	<b>Affiliation</b>	<b>Role/Responsibility</b>
Mike Hess	Montrose	Client Project Manager/QI/Trailer Operator
Paul Repuyan	Montrose	Field Technician/ Field Support
Jack Hutchison	Montrose	Report Preparation
Jessica Alderton	GM	Client Liaison/Test Coordinator

## **2.0 PLANT AND SAMPLING LOCATION DESCRIPTIONS**

### **2.1 PROCESS DESCRIPTION, OPERATION, AND CONTROL EQUIPMENT**

General Motors owns and operates an extensive engine testing facility for research and development of internal combustion engines using a wide variety of fuels and test protocols mandated by the United States Environmental Protection Agency (EPA). Depending on the engine type, the engines can be fueled by unleaded gasoline, leaded gasoline, diesel, and other fuels running a variety of tests on engines and engine components. A variety of test cycles are used depending on the purpose of the test program and the type of the engine. The engines are tested with or without control equipment, such as catalytic converters and particulate traps. The Race Engine and Wing 3 Gas Engine were in operation during this test event.

### **2.2 OPERATING CONDITIONS AND PROCESS DATA**

Plant personnel were responsible for establishing the test conditions and collecting all applicable unit-operating data. The process data that was provided is presented in Appendix B.

### 3.0 SAMPLING AND ANALYTICAL PROCEDURES

#### 3.1 TEST METHODS

The test methods for this test program were presented previously in Table 1-1. Additional information regarding specific applications or modifications to standard procedures is presented below.

##### 3.1.1 EPA Methods 3A and 7E, Determination of Oxygen and Nitrogen Oxides Concentrations in Emissions from Stationary Sources (Instrumental Analyzer Procedures)

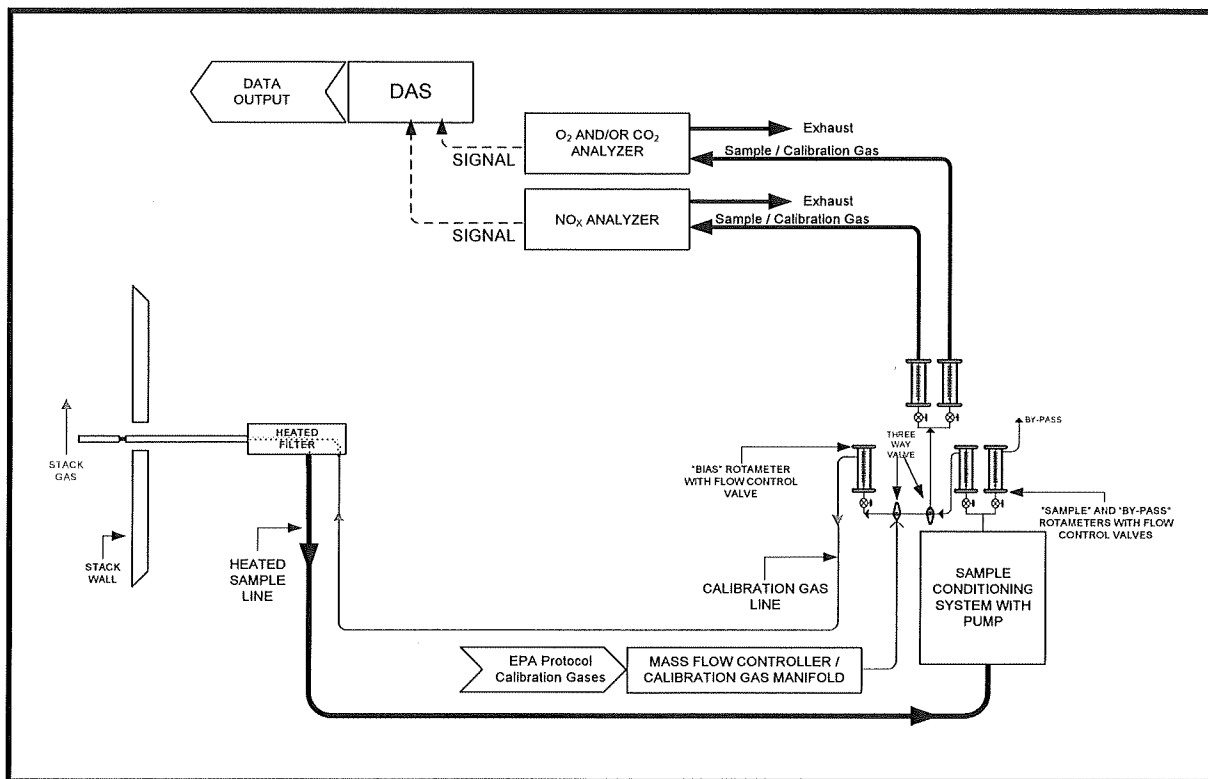
Concentrations of O<sub>2</sub> and NO<sub>x</sub> are measured simultaneously using EPA Methods 3A and 7E which are instrumental test methods. Conditioned gas is sent to a series of analyzers to measure the gaseous emission concentrations. The performance requirements of the method must be met to validate the data.

Pertinent information regarding the performance of the method is presented below:

- Method Options:
  - A paramagnetic analyzer is used to measure O<sub>2</sub>
  - A chemiluminescent analyzer is used to measure NO<sub>x</sub>
  - The alternative NO<sub>x</sub> converter efficiency test described in EPA Method 7E Section 16.2 is used
- Method Exceptions:
  - None
- Target and/or Minimum Required Sample Duration: 64 - 72 minutes

With the exception of CO<sub>2</sub> analyzer, the typical sampling system is detailed in Figure 3-1.

**FIGURE 3-1  
 EPA METHOD 3A AND 7E SAMPLING TRAIN**



**3.1.2 EPA Method 19, Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxide Emission Rates**

EPA Method 19 is used to calculate mass emission rates in units of lb/MMBtu. EPA Method 19, Table 19-2 contains a list of assigned fuel factors for different types of fuels, which can be used for these calculations.

Pertinent information regarding the performance of the method is presented below:

- Method Options:
  - F factor is calculated from analysis of fuel samples collected on the test day
- Method Exceptions:
  - None

**3.2 PROCESS TEST METHODS**

The test plan did not require that process samples be collected during this test program; therefore, no process sample data are presented in this test report.

#### **4.0 TEST DISCUSSION AND RESULTS**

##### **4.1 FIELD TEST DEVIATIONS AND EXCEPTIONS**

No field deviations or exceptions from the test plan or test methods occurred during this test program.

##### **4.2 PRESENTATION OF RESULTS**

The average results are compared to the permit limits in Tables 1-2 and 1-3. The results of individual compliance test runs performed are presented in Tables 4-1 and 4-2. Emissions are reported in units consistent with those in the applicable regulations or requirements. Additional information is included in the appendices as presented in the Table of Contents.



General Motors, LLC– Pontiac, Michigan  
 2022 Racing Engine and Wing 3 Gas Engine Compliance Test Report

**TABLE 4-1  
 NO<sub>x</sub> EMISSIONS RESULTS -  
 RACE ENGINE**

<b>Run Number</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>Average</b>
<b>Date</b>	5/17/2022	5/17/2022	5/17/2022	--
<b>Time</b>	09:43-11:06	11:17-12:39	12:50-14:11	--
<b>Process Data</b>				
heating value, Btu/lb	18,663	18,663	18,663	18,663
gas flow, g/sec	19.223	18.888	19.176	19.096
gas flow, lb/hr	152.573	149.914	152.200	151.562
<b>Sampling &amp; Flue Gas Parameters</b>				
sample duration, minutes	72	71	71	--
O <sub>2</sub> , % volume dry	2.8	3.1	2.6	2.8
<b>Nitrogen Oxides (NO<sub>x</sub> as NO<sub>2</sub>)</b>				
ppmvd	1,211.5	1,153.3	1,188.3	1,184.4
lb/MMBtu	1.53	1.48	1.48	1.49
lb/hr	4.35	4.13	4.20	4.23

**TABLE 4-2  
 NO<sub>x</sub> EMISSIONS RESULTS -  
 WING 3 GAS ENGINE**

Run Number	1	2	3	Average
Date	5/18/2022	5/18/2022	5/18/2022	--
Time	10:16-11:23	11:37-12:40	13:02-14:06	--
<b>Process Data</b>				
heating value, Btu/lb	19,208	19,208	19,208	19,208
gas flow, g/sec	0.629	0.646	0.671	0.649
gas flow, lb/hr	4.990	5.129	5.327	5.149
annual average fuel rate, MMBtu/hr				0.12
<b>Sampling &amp; Flue Gas Parameters</b>				
sample duration, minutes	68	64	65	--
O <sub>2</sub> , % volume dry	0.8	0.8	0.8	0.8
<b>Nitrogen Oxides (NO<sub>x</sub> as NO<sub>2</sub>)</b>				
ppmvd	1,366.8	1,379.2	1,322.7	1,356.2
lb/MMBtu	1.55	1.56	1.50	1.53
lb/hr	0.15	0.15	0.15	0.15
lb/hr-scaled up*				0.18

\*The scaled-up lb/hr NO<sub>x</sub> (as NO<sub>2</sub>) emissions for D301 utilizing gasoline is calculated using the facility provided Annual Average Fuel Rate (MMBtu/hr) and the calculated F<sub>d</sub>-Based NO<sub>x</sub> emissions (as NO<sub>2</sub>)

## **5.0 INTERNAL QA/QC ACTIVITIES**

### **5.1 QA/QC AUDITS**

EPA Method 3A and 7E calibration audits were all within the measurement system performance specifications for the calibration drift checks, system calibration bias checks, and calibration error checks.

The NO<sub>2</sub> to NO converter efficiency checks of each analyzer were conducted per the procedures in EPA Method 7E, Section 8.2.4. The conversion efficiencies met the criteria.

### **5.2 QA/QC DISCUSSION**

All QA/QC criteria were met during this test program.

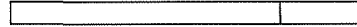
### **5.3 QUALITY STATEMENT**

Montrose is qualified to conduct this test program and has established a quality management system that led to accreditation with ASTM Standard D7036-04 (Standard Practice for Competence of Air Emission Testing Bodies). Montrose participates in annual functional assessments for conformance with D7036-04 which are conducted by the American Association for Laboratory Accreditation (A2LA). All testing performed by Montrose is supervised on site by at least one QI as defined in D7036-04 Section 8.3.2. Data quality objectives for estimating measurement uncertainty within the documented limits in the test methods are met by using approved test protocols for each project as defined in D7036-04 Sections 7.2.1 and 12.10. Additional quality assurance information is included in the report appendices. The content of this report is modeled after the EPA Emission Measurement Center Guideline Document (GD-043).

## **APPENDIX A FIELD DATA AND CALCULATIONS**

## Appendix A.1 Instrumental Test Method Data

Date		
5/17/2022		
Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Average	2.92	1182.9



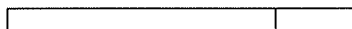
9:43:26	5.64	59.19
9:44:26	1.81	120.3
9:45:26	3.10	661.9
9:46:26	3.05	1330
9:47:26	3.58	1312
9:48:26	2.94	1256
9:49:26	2.62	1261
9:50:26	2.80	1289
9:51:26	3.13	1156
9:52:26	2.69	1140
9:53:26	2.94	1303
9:54:26	2.77	1298
9:55:26	2.82	1269
9:56:26	2.93	1129
9:57:26	2.92	1292
9:58:26	2.68	1186
9:59:26	2.72	1193
10:00:26	2.96	1243
10:01:26	2.71	1292
10:02:26	2.74	1304
10:03:26	2.84	1281
10:04:26	2.89	1356
10:05:26	2.50	1328
10:06:26	2.71	1334
10:07:26	3.02	1230
10:08:26	3.08	1223
10:09:26	2.33	1281
10:10:26	2.65	1312
10:11:26	3.23	1333
10:12:26	3.14	1419
10:13:26	2.19	1184
10:14:26	2.71	1156
10:15:26	3.20	1274
10:16:26	3.33	1375
10:17:26	2.56	1333
10:18:26	2.74	1282
10:19:26	3.94	1226
10:20:26		
10:21:26		
10:22:26		
10:23:26		
10:24:26		
10:25:26		
10:26:26		
10:27:26		
10:28:26		
10:29:26		
10:30:26		
10:31:26		
10:32:26	2.71	1014
10:33:26	2.80	1282
10:34:26	3.36	1134
10:35:26	3.16	1279
10:36:26	2.63	1170
10:37:26	2.64	1130
10:38:26	2.93	1241
10:39:26	2.95	1317
10:40:26	2.84	1283
10:41:26	2.81	1211
10:42:26	2.90	1273
10:43:26	2.61	1335
10:44:26	2.84	1250

4.31	1117
0.92	635.9
2.03	127.1
18.78	106.8
20.62	16.96
20.91	9.68
20.97	8.71
20.90	6.64
20.82	5.52
20.85	3.89
16.91	6.94
4.75	363.7

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Date  
5/17/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Average	2.92	1182.9

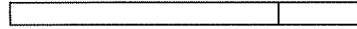


10:45:26	3.17	1253
10:46:26	2.70	1156
10:47:26	2.43	1164
10:48:26	2.65	1002
10:49:26	3.25	1042
10:50:26	2.59	1205
10:51:26	2.40	1192
10:52:26	2.80	1175
10:53:26	3.09	1087
10:54:26	2.66	1220
10:55:26	2.77	1176
10:56:26	2.81	1158
10:57:26	2.90	1137
10:58:26	2.78	1193
10:59:26	2.92	1137
11:00:26	2.75	1131
11:01:26	2.61	1085
11:02:26	3.01	1292
11:03:26	2.85	1172
11:04:26	2.65	1168
11:05:26	3.36	1093
11:06:26	5.27	995.8

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Date  
5/17/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Average	3.19	1116.4



11:17:12	19.89	437.4
11:18:12	14.47	25.43
11:19:12	4.37	364.7
11:20:12	2.89	982.4
11:21:12	3.16	994.2
11:22:12	3.04	1069
11:23:12	2.47	1135
11:24:12	2.72	1128
11:25:12	3.13	1062
11:26:12	2.50	1111
11:27:12	2.43	1080
11:28:12	2.72	1103
11:29:12	3.13	1058
11:30:12	2.55	1180
11:31:12	2.74	1146
11:32:12	2.67	1047
11:33:12	2.92	1100
11:34:12	2.75	1183
11:35:12	2.85	1126
11:36:12	2.68	1117
11:37:12	2.62	1081
11:38:12	2.85	1155
11:39:12	2.62	1118
11:40:12	2.66	1114
11:41:12	2.63	993.8
11:42:12	2.96	1056
11:43:12	2.64	1148
11:44:12	2.64	1126
11:45:12	2.81	1112
11:46:12	2.92	1227
11:47:12	2.38	1113
11:48:12	2.66	1024
11:49:12	2.99	1066
11:50:12	2.97	1022
11:51:12	2.38	1103
11:52:12	2.60	1084
11:53:12		
11:54:12		
11:55:12		
11:56:12		
11:57:12		
11:58:12		
11:59:12		
12:00:12		
12:01:12		
12:02:12		
12:03:12		
12:04:11		
12:05:11	2.72	1181
12:06:11	2.86	1185
12:07:11	3.12	1237
12:08:11	2.74	1240
12:09:11	2.58	1121
12:10:11	2.67	1167
12:11:11	2.84	1269
12:12:11	2.59	1229
12:13:11	2.60	1228
12:14:11	2.72	1132
12:15:11	2.97	1192
12:16:11	2.34	1251
12:17:11	2.62	1218
12:18:11	2.94	1231

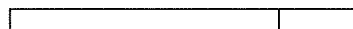
4.13	979.7
4.19	990.5
1.46	656.8
7.86	102.9
19.61	80.31
20.63	12.66
20.91	8.09
20.96	6.40
20.86	5.77
20.59	3.93
4.08	65.31
3.34	588.5

Switched headers



Date  
5/17/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Average	3.19	1116.4

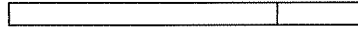


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12:19:11	2.97	1384
12:20:11	2.10	1202
12:21:11	2.61	1203
12:22:11	3.02	1162
12:23:11	3.03	1131
12:24:11	2.18	1237
12:25:11	2.58	1208
12:26:11	2.98	1211
12:27:11	3.09	1393
12:28:11	2.44	1191
12:29:11	2.48	1225
12:30:11	2.84	1304
12:31:11	2.95	1350
12:32:11	2.63	1095
12:33:11	2.64	1145
12:34:11	2.84	1240
12:35:11	2.83	1260
12:36:11	2.84	1210
12:37:11	3.39	1130
12:38:11	3.83	1101
12:39:11	2.45	1007

Date  
5/17/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Average	2.71	1145.6



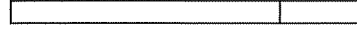
12:50:42	0.74	689.0
12:51:42	2.22	263.0
12:52:42	3.33	1105
12:53:42	2.66	1228
12:54:42	2.78	1202
12:55:42	3.05	1362
12:56:42	2.57	1132
12:57:42	2.53	1236
12:58:42	2.77	1160
12:59:42	2.93	1409
13:00:42	2.29	1222
13:01:42	2.60	1258
13:02:42	2.94	1244
13:03:42	3.05	1282
13:04:42	2.18	1308
13:05:42	2.57	1132
13:06:42	3.03	1210
13:07:42	3.05	1319
13:08:42	2.15	1212
13:09:42	2.48	1220
13:10:42	2.96	1179
13:11:42	3.11	1377
13:12:42	2.67	1185
13:13:42	2.40	1259
13:14:42	2.77	1217
13:15:42	2.95	1268
13:16:42	2.62	1217
13:17:42	2.66	1190
13:18:42	2.65	1141
13:19:42	2.70	1260
13:20:42	2.69	1264
13:21:42	2.96	1190
13:22:42	2.66	1244
13:23:41	2.86	1325
13:24:42	2.79	1191
13:25:41	3.38	1266
13:26:41		
13:27:41		
13:28:41		
13:29:41		
13:30:41		
13:31:41		
13:32:41		
13:33:41		
13:34:41		
13:35:41		
13:36:41		
13:37:41	2.75	1052
13:38:41	3.21	973.9
13:39:41	2.81	1159
13:40:41	2.59	1174
13:41:41	2.60	1152
13:42:41	2.74	1141
13:43:41	2.61	1130
13:44:41	2.87	1152
13:45:41	2.63	1155
13:46:41	2.50	1097
13:47:41	2.80	1075
13:48:41	2.69	1114
13:49:41	2.59	1086
13:50:41	2.64	1026
13:51:41	2.86	1098

4.39	1098
2.32	1000
0.90	273.7
13.19	121.2
20.41	50.39
20.86	11.35
21.00	8.77
20.96	7.06
20.48	6.01
3.60	41.88
3.43	686.3

Switched headers

Date  
5/17/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Average	2.71	1145.6



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13:52:41	2.47	1163
13:53:41	2.60	1116
13:54:41	2.74	1108
13:55:41	2.86	1198
13:56:41	2.20	1090
13:57:41	2.60	1139
13:58:41	2.90	1002
13:59:41	2.88	1097
14:00:41	2.02	1056
14:01:41	2.53	1036
14:02:41	2.98	1033
14:03:41	2.98	1121
14:04:41	2.09	1149
14:05:41	2.48	1096
14:06:41	2.92	1019
14:07:41	3.06	1086
14:08:41	2.66	1144
14:09:41	2.70	1161
14:10:41	3.51	1010
14:11:41	3.41	961.1

Date		
5/18/2022		
Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Average	0.63	1350.6
<hr/>		
10:16:17	1.02	1170
10:17:17	0.94	1221
10:18:17	0.88	1262
10:19:17	0.82	1354
10:20:17	0.75	1496
10:21:17	0.66	1585
10:22:17	0.62	1592
10:23:17	0.61	1599
10:24:17	0.60	1605
10:25:17	0.60	1592
10:26:17	0.60	1567
10:27:17	0.63	1506
10:28:17	0.62	1466
10:29:17	0.60	1428
10:30:17	0.62	1338
10:31:17	0.65	1297
10:32:17	0.64	1213
10:33:17	0.63	1210
10:34:17	0.59	1286
10:35:17	0.58	1268
10:36:17	0.57	1287
10:37:17	0.59	1292
10:38:17	0.58	1289
10:39:17	0.60	1288
10:40:17	0.61	1295
10:41:17	0.59	1300
10:42:17	0.57	1306
10:43:17	0.59	1311
10:44:17	0.59	1311
10:45:17	0.60	1313
10:46:17	0.62	1327
10:47:17	0.62	1332
10:48:17	0.59	1331
10:49:17	0.60	1333
10:50:17	0.60	1334
10:51:17	0.60	1337
10:52:17	0.59	1333
10:53:17	0.59	1324
10:54:17	0.59	1321
10:55:17	0.60	1330
10:56:17	0.58	1331
10:57:17	0.59	1334
10:58:17	0.59	1335
10:59:17	0.61	1336
11:00:17	0.61	1338
11:01:17	0.59	1344
11:02:17	0.62	1340
11:03:17	0.63	1337
11:04:17	0.63	1346
11:05:17	0.63	1351
11:06:17	0.60	1349
11:07:17	0.59	1348
11:08:17	0.60	1340
11:09:17	0.62	1331
11:10:17	0.62	1343
11:11:17	0.61	1342
11:12:17	0.62	1334
11:13:17	0.62	1337
11:14:17	0.63	1343
11:15:17	0.62	1340
11:16:17	0.63	1340
11:17:17	0.63	1336
11:18:17	0.63	1340
11:19:17	0.62	1344
11:20:17	0.61	1348
11:21:17	0.60	1340
11:22:17	0.59	1326
11:23:17	0.60	1319

Date  
5/18/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Average	0.60	1344.5

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11:37:34	0.57	1364
11:38:34	0.58	1340
11:39:34	0.57	1350
11:40:34	0.58	1361
11:41:34	0.58	1365
11:42:34	0.57	1367
11:43:34	0.56	1361
11:44:34	0.58	1355
11:45:34	0.56	1358
11:46:34	0.58	1365
11:47:34	0.59	1357
11:48:34	0.60	1361
11:49:34	0.60	1370
11:50:34	0.61	1367
11:51:34	0.60	1360
11:52:34	0.60	1359
11:53:34	0.61	1363
11:54:34	0.60	1374
11:55:34	0.60	1395
11:56:34	0.62	1392
11:57:34	0.60	1378
11:58:34	0.60	1372
11:59:34	0.62	1370
12:00:34	0.61	1366
12:01:34	0.62	1359
12:02:34	0.61	1356
12:03:34	0.60	1356
12:04:34	0.59	1358
12:05:34	0.61	1359
12:06:34	0.60	1364
12:07:34	0.60	1365
12:08:34	0.60	1367
12:09:34	0.59	1354
12:10:34	0.62	1343
12:11:34	0.61	1343
12:12:34	0.61	1346
12:13:34	0.62	1340
12:14:34	0.61	1339
12:15:34	0.62	1335
12:16:34	0.62	1319
12:17:34	0.62	1314
12:18:34	0.64	1318
12:19:34	0.64	1318
12:20:34	0.65	1321
12:21:34	0.64	1321
12:22:34	0.63	1318
12:23:34	0.64	1319
12:24:34	0.61	1326
12:25:34	0.58	1325
12:26:34	0.60	1319
12:27:34	0.60	1321
12:28:34	0.61	1325
12:29:34	0.59	1323
12:30:34	0.59	1323
12:31:34	0.60	1316
12:32:34	0.60	1309
12:33:34	0.60	1309
12:34:34	0.61	1314
12:35:34	0.60	1319
12:36:34	0.60	1327
12:37:34	0.60	1331
12:38:34	0.61	1323
12:39:34	0.60	1319
12:40:34	0.60	1319

Date		
5/18/2022		
Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Average	0.60	1281.8
<hr/>		
13:02:25	0.63	1264
13:03:25	0.62	1265
13:04:25	0.63	1282
13:05:25	0.65	1284
13:06:25	0.63	1272
13:07:25	0.62	1266
13:08:25	0.64	1263
13:09:25	0.63	1265
13:10:25	0.63	1275
13:11:25	0.66	1278
13:12:25	0.64	1277
13:13:25	0.65	1277
13:14:25	0.64	1273
13:15:25	0.63	1274
13:16:25	0.63	1278
13:17:25	0.62	1284
13:18:25	0.65	1282
13:19:25	0.62	1279
13:20:25	0.62	1281
13:21:25	0.63	1287
13:22:25	0.62	1294
13:23:25	0.62	1300
13:24:25	0.64	1298
13:25:25	0.62	1293
13:26:25	0.56	1290
13:27:25	0.57	1287
13:28:25	0.57	1287
13:29:25	0.57	1285
13:30:25	0.58	1281
13:31:25	0.58	1283
13:32:25	0.57	1285
13:33:25	0.58	1281
13:34:25	0.57	1272
13:35:25	0.57	1269
13:36:25	0.58	1276
13:37:25	0.58	1281
13:38:25	0.57	1282
13:39:25	0.60	1290
13:40:25	0.56	1294
13:41:25	0.57	1294
13:42:25	0.60	1287
13:43:25	0.58	1282
13:44:25	0.60	1285
13:45:25	0.61	1288
13:46:25	0.60	1287
13:47:25	0.60	1288
13:48:25	0.61	1290
13:49:25	0.60	1286
13:50:25	0.60	1280
13:51:25	0.60	1273
13:52:25	0.57	1275
13:53:25	0.60	1280
13:54:25	0.60	1275
13:55:25	0.59	1273
13:56:25	0.60	1274
13:57:25	0.60	1282
13:58:25	0.59	1286
13:59:25	0.60	1285
14:00:25	0.61	1283
14:01:25	0.59	1284
14:02:25	0.59	1289
14:03:25	0.60	1292
14:04:25	0.59	1292
14:05:25	0.60	1288
14:06:25	0.63	1283

## Appendix A.2 Calculations/Results

OXYGEN

<u>Analyzer Values</u>	<u>Actual</u>	<u>Cal Error</u>	<u>Bias</u>	<u>Run 1</u>	<u>Run 2</u>	<u>Run 3</u>
Date		5/17/22	5/17/22	5/17/22	5/17/22	5/17/22
Start Time		7:58	8:16	9:43	11:17	12:50
Stop Time		8:16	8:24	11:06	12:39	14:11
Concentration, C (%)				2.92	3.19	2.71
Zero Cal Gas, C <sub>0</sub> (%)	0.0	0.01	0.11	0.13	0.13	0.16
Mid Cal Gas (%)	10.02	10.12				
High Cal Gas (%)	20.12	20.21				
Span Value (%)	20.12					
Bias/Drift Check Gas, C <sub>s</sub> (%)	10.02		10.04	10.03	10.03	10.04
<b>RESULTS</b>						
Zero Error (%)	2 % of Span	0.02				
Mid Error (%)		0.47				
High Error (%)		0.43				
Upscale Error (%)						
Zero Bias (%)	5 % of Span		0.51	0.61	0.61	0.77
Upscale Bias (%)			-0.40	-0.43	-0.42	-0.39
Zero Drift (%)	3 % of Span			0.10	0.00	0.16
Upscale Drift (%)				-0.04	0.01	0.04
Concentration Corrected for Drift, C <sub>d</sub> (%)				<b>2.83</b>	<b>3.10</b>	<b>2.60</b>



NITROGEN OXIDES

Correction to Fc Factor (lb/MMBtu)

Correction to Fd Factor (lb/MMBtu) 9,126

<u>Analyzer Values</u>	<u>Actual</u>	<u>Cal Error</u>	<u>Bias</u>	<u>Run 1</u>	<u>Run 2</u>	<u>Run 3</u>
Date		5/17/22	5/17/22	5/17/22	5/17/22	5/17/22
Start Time		7:58	8:16	9:43	11:17	12:50
Stop Time		8:16	8:24	11:06	12:39	14:11
Concentration, C (ppm)				1182.9	1116.4	1145.6
Zero Cal Gas, C <sub>0</sub> (ppm)	0.0	1.59	5.3	7.2	6.6	7.6
Mid Cal Gas (ppm)	908.4	906.6				
High Cal Gas (ppm)	1987	1999				
Span Value (ppm)	1987					
Bias/Drift Check Gas, C <sub>s</sub> (ppm)	908.4		895.4	881.6	880.0	874.9
	906.6					

**RESULTS**

Zero Error (%)	2 % of Span	0.1				
Mid Error (%)		-0.1				
High Error (%)		0.6				
Upscale Error (%)						
Zero Bias (%)	5 % of Span		0.18	0.28	0.25	0.30
Upscale Bias (%)			-0.56	-1.26	-1.34	-1.60
Zero Drift (%)	3 % of Span			0.10	-0.03	0.05
Upscale Drift (%)				-0.69	-0.08	-0.26
Concentration Corrected for Drift, C <sub>d</sub> (ppm)				1211.5	1153.3	1188.3
Emission Rate, Fd Factor, E <sub>Fd</sub> (lb/MMBtu)				1.53	1.48	1.48

Parameters	Run 1	Run 2	Run 3
Date	5/17/22	5/17/22	5/17/22
Start Time	9:43	11:17	12:50
Stop Time	11:06	12:39	14:11
Dimensions of Sample Location, $D_s$ (in)	4.0	4.0	4.0
Oxygen (% dry)	2.83	3.10	2.60
Run Time, $\theta$ (minutes)	72	71	71

**RESULTS**

Area of Sample Location, $A_s$ (ft <sup>2</sup> )	0.09	0.09	0.09
Nitrogen Oxides Concentration, C (ppmdv)	1211.5	1153.3	1188.3
Nitrogen Oxides Emission rate, E (lb/MMBtu)	1.53	1.48	1.48

**GM Pontiac  
Race Engine Dyno**

**RESULTS**

**Project No. 15629**

**Test Parameters**

	<b>Run 1</b>	<b>Run 2</b>	<b>Run 3</b>	<b>Average</b>
Date	5/17/2022	5/17/2022	5/17/2022	
Start Time	9:43	11:17	12:50	
Stop Time	11:06	12:39	14:11	

**Process Data**

Heating Value (Btu/lb)	18,663	18,663	18,663	18,663
Gas flow (g/sec)	19.223	18.888	19.176	19.096
Gas flow (lb/hr)	152.573	149.914	152.200	151.562

**Gas Conditions**

Oxygen (% dry)	2.8	3.1	2.6	<b>2.8</b>
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**Pollutant Results**

Nitrogen Oxides Concentration (ppmdv)	1211.5	1153.3	1188.3	<b>1184.4</b>
Nitrogen Oxides Emission rate, E (lb/MMBtu)	1.53	1.48	1.48	<b>1.49</b>
Nitrogen Oxides Emission rate, E (lb/hr)	4.35	4.13	4.20	<b>4.23</b>

**RECEIVED**

**AUG 01 2022**

**AIR QUALITY DIVISION**

OXYGEN

<b>Analyzer Values</b>	<b>Actual</b>	<b>Cal Error</b>	<b>Bias</b>	<b>Run 1</b>	<b>Run 2</b>	<b>Run 3</b>
Date		5/18/22	5/18/22	5/18/22	5/18/22	5/18/22
Start Time		8:31	9:08	10:16	11:37	13:02
Stop Time		8:57	9:13	11:23	12:40	14:06
Concentration, C (%)				0.63	0.60	0.60
Zero Cal Gas, C <sub>0</sub> (%)	0.0	0.04	-0.19	-0.16	-0.16	-0.16
Mid Cal Gas (%)	10.02	9.94				
High Cal Gas (%)	20.12	20.15				
Span Value (%)	20.12					
Bias/Drift Check Gas, C <sub>s</sub> (%)	10.02		9.94	9.92	9.91	9.90
<b>RESULTS</b>						
Zero Error (%)	2 % of Span	0.17				
Mid Error (%)		-0.40				
High Error (%)		0.16				
Upscale Error (%)						
Zero Bias (%)	5 % of Span		-1.11	-0.97	-0.96	-0.98
Upscale Bias (%)			-0.01	-0.10	-0.16	-0.20
Zero Drift (%)	3 % of Span			0.14	0.01	-0.02
Upscale Drift (%)				-0.09	-0.06	-0.04
Concentration Corrected for Drift, C <sub>d</sub> (%)				<b>0.79</b>	<b>0.76</b>	<b>0.76</b>

NITROGEN OXIDES

Correction to Carbon Dioxide (%)  
 Correction to Oxygen (%)  
 Correction to Fc Factor (lb/MMBtu)  
 Correction to Fd Factor (lb/MMBtu) 9,123

Analyzer Values	Actual	Cal Error	Bias	Run 1	Run 2	Run 3
Date		5/18/22	5/18/22	5/18/22	5/18/22	5/18/22
Start Time		8:31	9:08	10:16	11:37	13:02
Stop Time		8:57	9:13	11:23	12:40	14:06
Concentration, C (ppm)				1350.6	1344.5	1281.8
Zero Cal Gas, C <sub>0</sub> (ppm)	0.0	0.41	6.0	6.7	7.2	6.8
Mid Cal Gas (ppm)	908.4	908.3				
High Cal Gas (ppm)	1987	1987				
Span Value (ppm)	1987					
Bias/Drift Check Gas, C <sub>s</sub> (ppm)	908.4		908.6	890.9	884.9	880.1

**RESULTS**

Zero Error (%)	2 % of Span	0.0				
Mid Error (%)		0.0				
High Error (%)		0.0				
Upscale Error (%)						
Zero Bias (%)	5 % of Span		0.28	0.32	0.34	0.32
Upscale Bias (%)			0.02	-0.87	-1.18	-1.42
Zero Drift (%)	3 % of Span			0.04	0.03	-0.02
Upscale Drift (%)				-0.89	-0.30	-0.24
Concentration Corrected for Drift, C <sub>d</sub> (ppm)				1366.8	1379.2	1322.7
Emission Rate, Fd Factor, E <sub>Fd</sub> (lb/MMBtu)				1.55	1.56	1.50

Parameters	Run 1	Run 2	Run 3
Date	5/18/22	5/18/22	5/18/22
Start Time	10:16	11:37	13:02
Stop Time	11:23	12:40	14:06
Dimensions of Sample Location, $D_s$ (in)	2.0	2.0	2.0
Oxygen (% dry)	0.79	0.76	0.76
Run Time, $\theta$ (minutes)	68	64	65
<b>RESULTS</b>			
Area of Sample Location, $A_s$ (ft <sup>2</sup> )	0.09	0.09	0.09
Nitrogen Oxides Concentration, C (ppmdv)	1366.8	1379.2	1322.7
Nitrogen Oxides Emission rate, E (lb/MMBtu)	1.55	1.56	1.50

**GM Pontiac  
Single Engine Dyno**

**RESULTS**

**Project No. 15629**

**Test Parameters**

	<b>Run 1</b>	<b>Run 2</b>	<b>Run 3</b>	<b>Average</b>
Date	5/18/2022	5/18/2022	5/18/2022	
Start Time	10:16	11:37	13:02	
Stop Time	11:23	12:40	14:06	

**Process Data**

Heating value (Btu/lb)	19,208	19,208	19,208	<b>19,208</b>
Gas flow (g/sec)	0.629	0.646	0.671	<b>0.649</b>
Gas flow (lb/hr)	4.990	5.129	5.327	<b>5.149</b>
Annual average fuel rate (MMBtu/hr)				<b>0.12</b>

**Gas Conditions**

Oxygen (% dry)	0.8	0.8	0.8	<b>0.8</b>
----------------	-----	-----	-----	------------

**Pollutant Results**

Nitrogen Oxides Concentration (ppmdv)	1366.8	1379.2	1322.7	<b>1356.2</b>
Nitrogen Oxides Emission rate (lb/MMBtu)	1.55	1.56	1.50	<b>1.53</b>
Nitrogen Oxides Emission rate, E (lb/hr)	0.15	0.15	0.15	<b>0.15</b>
Nitrogen Oxides Emission rate, E (lb/hr-scaled up)				<b>0.18</b>

## **Appendix A.3 Example Calculations**



**Sample Calculations Race Engine Run 1**

**Area of Sample Location**

$$A_s = (\pi) \left( \frac{d_s}{2 \times 12} \right)^2$$

$$A_s = 0.09$$

$$d_s = 4$$

Where:

- $A_s$  = area of sample location (ft<sup>2</sup>)
- $d_s$  = diameter of sample location (in)
- 12 = conversion factor (in/ft)
- 2 = conversion factor (diameter to radius)

**Nitrogen Oxides Concentration, Corrected for Analyzer Drift<sup>1</sup>**

$$C_d = \left( C - \left( \frac{c_{0i} + c_{0f}}{2} \right) \right) \left( \frac{c_a}{\left( \frac{c_{si} + c_{sf}}{2} \right) - \left( \frac{c_{0i} + c_{0f}}{2} \right)} \right)$$

$C_d$	= 1211.5	$C_a$	= 908.4
$C$	= 1182.9	$C_{si}$	= 7.2
$C_{0i}$	= 5.3	$C_{sf}$	= 881.6
$C_{0f}$	= 895.4		

Where:

- $C_d$  = nitrogen oxides concentration, corrected for analyzer drift (ppmdv)
- $C$  = nitrogen oxides concentration (ppmdv)
- $C_{0i}$  = initial zero calibration value (ppm)
- $C_{0f}$  = final zero calibration value (ppm)
- $C_a$  = actual span gas value (ppm)
- $C_{si}$  = initial span calibration value (ppm)
- $C_{sf}$  = final span calibration value (ppm)

<sup>1</sup>Calculations for O2 are performed in a similar manner

**Nitrogen Oxide Emission Rate, lb/MMBtu**

$$E_{NOx(lb/MMBtu)} = \frac{(C_d)(MW)(F_d)(20.9)}{(385.3 \times 10^6)(20.9 - O_2)}$$

$E_{NOx}$	= 1.53	$F_d$	= 9,126
$C_d$	= 1211.5	$O_2$	= 2.83
MW	= 46.01		

Where:

- $E_{NOx(lb/MMBtu)}$  = nitrogen oxides emission rate (lb/MMBtu)
- $C_d$  = nitrogen oxides concentration, corrected for drift (ppmdv)
- MW = molecular weight of nitrogen oxide (lb/lb-mole)
- $F_d$  = oxygen based fuel factor (scf/MMBtu)
- $O_2$  = oxygen content of the gas stream (%)
- 20.9 = oxygen content of ambient air (%)
- 385.3 = volume occupied by one pound of gas at standard conditions (dscf/lbmole)
- $10^6$  = conversion factor (ppm)

**Nitrogen Oxide Emission Rate, lb/hr**

$$E_{NOx} = \frac{(F_{gas})(H)(E_{NOx(lb/MMBtu)})}{(1.0 \times 10^6)}$$

$E_{NOx}$	= 4.35	H	= 18,663
$F_{gas}$	= 152.573	$E_{NOx(lb/MMBtu)}$	= 1.53

Where:

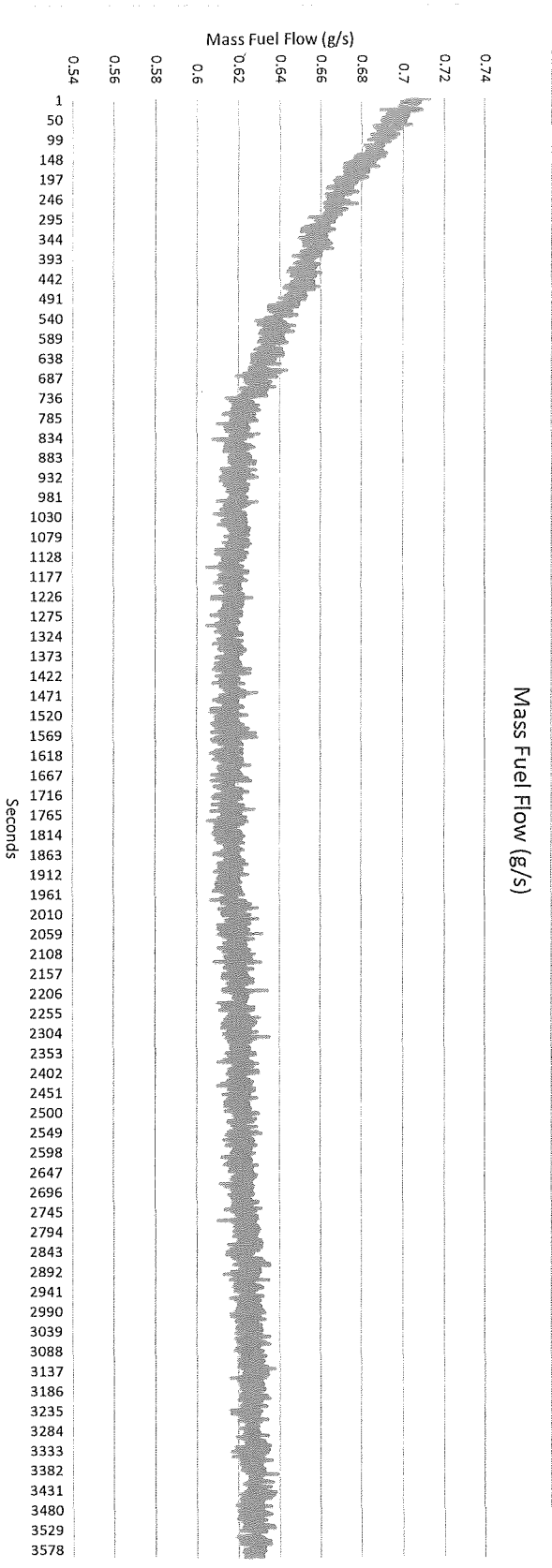
- $E_{NOx}$  = nitrogen oxides emission rate (lb/hr)
- $F_{gas}$  = gas flow rate, (lb/hr)
- H = gas heating value (Btu/lb)
- $E_{NOx(lb/MMBtu)}$  = volumetric flow rate of the dry gas stream at standard conditions (dscfm)
- 1,000,000 = conversion factor (Btu/MMBtu)

## **APPENDIX B FACILITY PROCESS DATA**

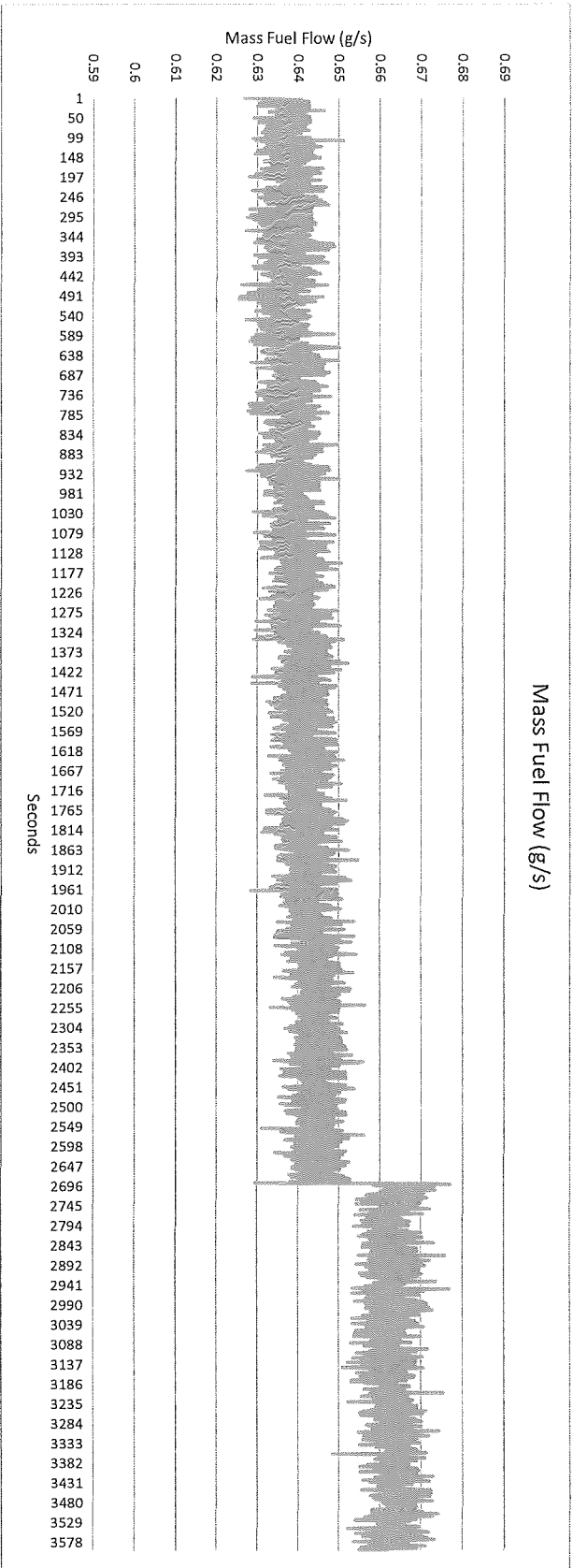
Location: General Motors Racing - Test Cell C  
 Date: 5/17/2022  
 Engine: LT6R\_R011\_R07

Run	\$iStartTime	SPEED E_ACT_N_avg rpm	BARO CEL_BARO_P_avg kPa	AFR Left E_AFR_L_avg -	AFR Right E_AFR_R_avg -	Exhaust Temp Left EXGSPRT_L_avg °C	Exhaust Temp Right EXGSPRT_R_avg °C	Fuel Flow S_FC_MF_avg g/s	Engine Inlet Air Temp BSKL_AIR_T_avg °C	Engine Inlet Pressure BSKL_CBA_AP_avg kPa
R005_Lemans_Laps_EPA [avg]	5/17/2022 9:40	5690.1	97.730	0.9789	0.9649	767.8	723.5	19.377	23.048	99.8
R006_Lemans_Laps_EPA_B1 [avg]	5/17/2022 10:28	5689.8	97.729	0.9777	0.9687	757.8	720.5	19.069	30.241	99.6
R007_Lemans_Laps_EPA_B1 [avg]	5/17/2022 11:08	5690.6	97.742	0.9767	0.9678	765.4	729.7	18.731	36.271	99.6
R008_Lemans_Laps_EPA_B2 [avg]	5/17/2022 12:01	5690.6	97.776	0.9831	0.9672	770.2	724.4	19.045	36.898	99.8
R009_Lemans_Laps_EPA_B2 [avg]	5/17/2022 12:37	5690.1	97.813	0.9792	0.9662	765.7	729.1	19.176	29.479	99.7
R010_Lemans_Laps_EPA_B1 [avg]	5/17/2022 13:34	5689.8	97.806	0.9818	0.9656	773.4	728.9	19.175	29.097	99.8
Run 1	5/17/2022 10:04	5690.0	97.729	0.9783	0.9668	762.8	722.0	19.223	26.644	99.7
Run 2	5/17/2022 11:34	5690.6	97.759	0.9799	0.9675	767.8	727.0	18.888	36.584	99.7
Run 3	5/17/2022 13:06	5690.0	97.810	0.9805	0.9659	769.5	729.0	19.176	29.288	99.8

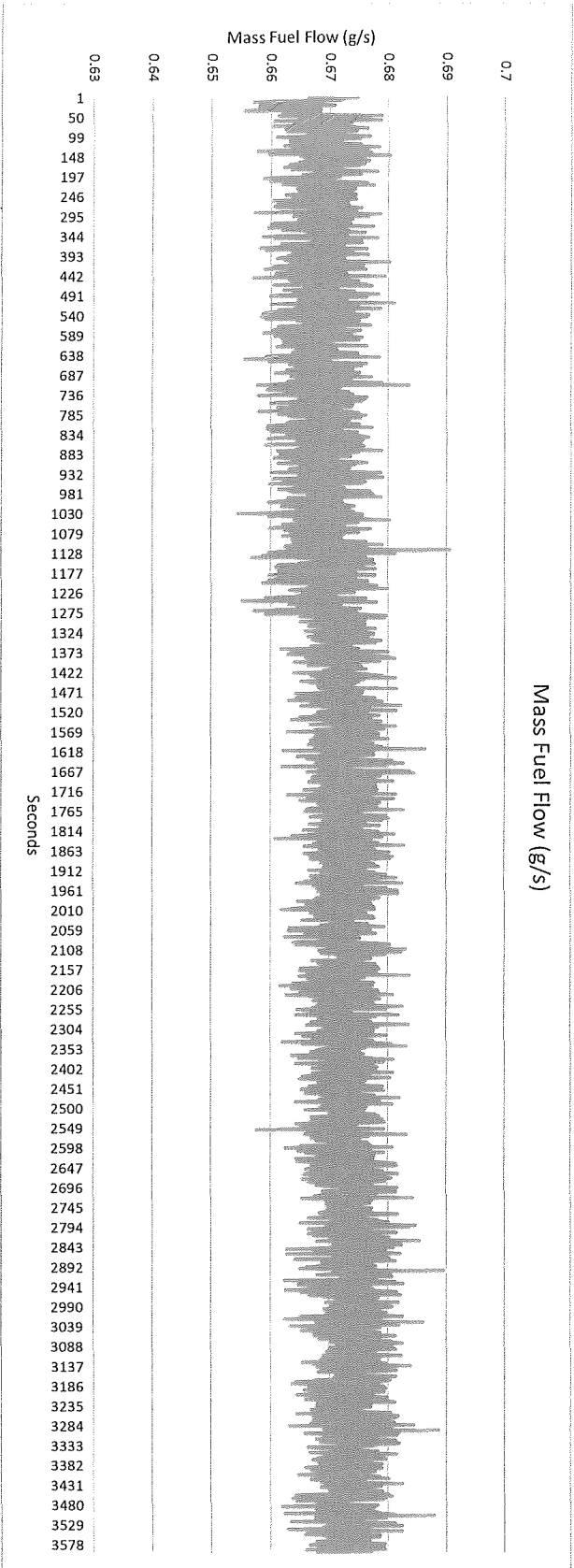
Database File Name R1036\_LPV\_12674521\_Degreen>2022\_05\_18\_EPA\_Cert\_1st\_1120>D301\_S\_FC\_VF[1]  
Total Fuel Flow (g) 2263.17887  
Average Fuel Flow (g/s) 0.628660797  
Start Time 5/18/2022 10:16  
Stop Time 5/18/2022 11:16



Database File Name R1036\_LFV\_12674521\_Degreeen>2022\_05\_18\_EPA\_Cert\_2nd\_1121>D301\_S\_FC\_VF  
Total Fuel Flow (g) 2326.486828  
Average Fuel Flow (g/s) 0.646246341  
Start Time 5/18/2022 11:37  
Stop Time 5/18/2022 12:37



Database File Name R1036\_LFV\_12674521\_Degreeen>2022\_05\_18\_EPA\_Cert\_3rd\_1122>D301\_S\_FC\_VF  
Total Fuel Flow (g) 2416.382998  
Average Fuel Flow (g/s) 0.671217499  
Start Time 5/18/2022 13:02  
Stop Time 5/18/2022 14:02



		Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Estimated	Comments
		Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec	Actual Total (YTD)	Year End		
D301	Tier III	4.48	2.673173	6.72	4.47	9.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	27.82	27.82		
D302	ULSD	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	Tank 301 - EPA Cert	
D303	RD-587T	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
D304	ULSD	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	Tank 301 - EPA Cert	
D305	RD-587T	2.17	4.75	17.10	4.73	15.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	44.06	44.06		
D306	Tier III	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
D307	Tier III	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
D308	Tier II	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
D309		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
D310		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
D370	Tier III	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
D370	Tier II	29.38	1559.271	29.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1618.35	1618.35		
														1690.23			

														GPS provided					
														Actual					
Consolidating amounts by fuel type														\$/gal	\$ Extended	Change vs 2020 (- = reduction)			
RD-587T	2.17	4.75	17.1	4.73	15.31	0	0	0	0	0	0	0	0	0	44.06	\$	-	#DIV/0!	
Sunoco GT	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$ 6.79	\$	-	-73%
Tier II	29.38	1559.271	29.7	0	0	0	0	0	0	0	0	0	0	0	1618.35	\$ 9.00	\$ 14,565.16	#DIV/0!	
Tier III	4.48	2.673173	6.72	4.47	9.48	0	0	0	0	0	0	0	0	0	27.82	\$ 9.96	\$ 277.12	3257%	
EEE w/sulph	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00			-99%	
ULSD	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	\$ 9.75	\$	-	#DIV/0!
														1690.23		\$ 14,842.28			



		Fuel Usage (Gallons)																
		2021								2022					MMBtu/gal	Total (gal)	Total (MMBtu)	
Testcell	Fuel Type	Jun	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May					
D301	Gas Tier III	8.27	1.00	0.71	4.17	2.90	1.70	6.94	4.48	2.67	173	6.72	4.47	9.48	0.1391	53.51	7.443682	
D303	Gas RD-587T														0.1276	0.00	0	
D305	Gas RD-587T	6.81	4.20	6.01	10.68	6.30	7.30	0.00	2.17	4.75	17.10	4.73	15.31	0.1276	85.49	10.90822		
D306	Gas Tier III	77.71													0.1391	77.85	10.82881	
D307	Gas Tier III														0.1391	0.00	0	
D308	Gas Tier II														0.1213	0.12	0.014714	
D309	Gas Tier II														0.1213	0.00	0	
D310	Gas Tier III														0.1391	0.00	0	
D370	Gas Tier II	31.61	1.30	49.80	261.86	177.80	466.40	115.83	29.38	1559.271	29.70	0.00	0.00	0.1213	2722.95	330.294		
																3044.60		

Test Cell Operating Hours															
		2021								2022					Total
Test Cell		June	July	August	September	October	November	December	January	February	March	April	May		
Gas Total		124.40	6.50	56.52	276.71	187.00	475.40	122.77	36.03	1566.69	53.52	9.20	24.79	2939.53	

Wing 3 Average Hourly Fuel Rate			
Fuel Type	Annual Usage (MMBtu)	Annual Operating Hours	Fuel Rate (MMBtu/hr)
Gasoline	359.5	2939.53	0.12

<b>F<sub>d</sub> Parameters</b>	<b>Run 1</b>
Hydrogen (%)	13.45
Carbon (%)	80.99
Sulfur (%)	0.00036
Nitrogen (%)	0.00
Oxygen (%)	5.56
Heating Value (Btu/lb)	18,663
<b>Result</b>	
F <sub>d</sub> (dscf/MBtu)	9,126

**GM Pontiac  
Single Dyno (Way 3)**

**Fd Parameters  
Fd**

**Project No. 015629**

<b>F<sub>d</sub> Parameters</b>	<b>Run 1</b>
Hydrogen (%)	13.71
Carbon (%)	82.93
Sulfur (%)	0.00087
Nitrogen (%)	0.00
Oxygen (%)	3.36
Heating Value (Btu/lb)	19,208

<b>Result</b>	
F <sub>d</sub> (dscf/MBtu)	9,123

Wednesday, May 25, 2022

Sean Wheeler  
Montrose Air Quality Services  
1371 Brummel Avenue  
Elk Grove Village, IL 60007

Workorder: 377704  
Project Name: GM Pontiac MI 015629 Race & Single Engine  
Purchase Order: PO-27754

Sean Wheeler,  
Paragon Laboratories, Inc. received the samples associated with the workorder listed above for the analyses presented in the following report. The analyses pertain only to the aliquot of sample received.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number below.

Please note that any unused portion of the sample(s) will be discarded 40 days after sample receipt, unless requested otherwise.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact me at 734-469-5614.

Sincerely,



Sharon Johnson

## GLOSSARY

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Abbreviation	Meaning	Explanation
ID	Identification	Preceded by "Lab", it describes the unique 10-digit sample number assigned by the laboratory. Preceded by "Sample", it describes the client-specified sample identifier.
Qual	Qualifier	Column that populates with an asterisk (*) when a related narrative comment appears in the Workorder Summary.
RL	Reporting Limit	The value at or above which a result is routinely reported.
MDL	Method Detection Limit	The minimum measured concentration that can be reported with 99% confidence that the measured concentration is distinguishable from method blank results.
DF	Dilution Factor	The dilution applied to the sample during analysis to arrive at the final reported analyte result.
Min	Minimum	The minimum value that a result can be to meet the applicable specification, regulatory, permit, or client-specified limit.
Max	Maximum	The maximum value that a result can be to meet the applicable specification, regulatory, permit, or client-specified limit.
(S)	Surrogate	A compound that is added to the sample to mimic one or more compounds of interest. Its recovery is used to evaluate the efficiency of recovering the compound(s) of interest.
<	Less Than	Symbol that indicates that a result is less than the value following it.
>	Greater Than	Symbol that indicates that a result is greater than the value following it.

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## SAMPLE SUMMARY

Lab ID	Sample ID	Sample Description	Matrix	Date Collected	Date Received	Collector
3777040001	Way 3	Engine Fuel	G	05/18/2022 00:00	05/19/2022 07:01	
3777040002	WEC	Engine Fuel	G	05/17/2022 00:00	05/19/2022 07:01	

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# WORKORDER SUMMARY

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## Accreditations

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Paragon Laboratories, Inc. is certified by the Michigan Department of Environment, Great Lakes, and Energy to analyze Drinking Water. (EGLE Lab No. 9901 Expires 2/25/2023)

[A] Paragon Laboratories, Inc. is accredited to ISO/IEC 17025:2017 by A2LA for analytical methods referring to this note. (A2LA Cert. No. 2705.01 Expires 5/31/2023)

RECEIVED

AUG 01 2022

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# ANALYTICAL RESULTS

Lab ID: 3777040001  
 Sample ID: Way 3  
 Description: Engine Fuel

Date Collected: 05/18/2022 00:00  
 Date Received: 05/19/2022 07:01

Matrix: Gasoline (G)  
 Collector:

Parameter	Result	Qual	Unit	RL	MDL	DF	Min	Max	Analyzed	By
Elemental Analysis by ASTM D5291 D [A]										
Carbon (Wt%)	82.93		% m/m	0.05		1			05/19/2022 14:00	AJB
Hydrogen (Wt%)	13.71		% m/m	0.05		1			05/19/2022 14:00	AJB
Elemental Analysis by ASTM D5453 [A]										
Sulfur	8.7		ppm m/m	0.1		1			05/20/2022 08:55	AKL
Sulfur	0.00087		% m/m	0.00001		1			05/20/2022 08:55	AKL
Elemental Analysis by ASTM D5622 A [A]										
Oxygen (Wt%)	3.36		% m/m	0.05		1			05/24/2022 09:00	AJB
Individual Parameters by ASTM D240 [A]										
Gross Heating Value (BTU/lb)	19208		BTU/lb	315		1			05/25/2022 09:40	TXM
Gross Heating Value (MJ/kg)	44.678		MJ/kg			1			05/25/2022 09:40	TXM
Net Heating Value (BTU/lb)	17957		BTU/lb	315		1			05/25/2022 09:40	TXM
Net Heating Value (MJ/kg)	41.769		MJ/kg			1			05/25/2022 09:40	TXM
Individual Parameters by ASTM D4052 [A]										
API Gravity at 15.56°C	57.2		°API	0.1		1			05/20/2022 08:50	LWH
Density at 15.56°C	0.7493		g/mL	0.0001		1			05/20/2022 08:50	LWH
Spec. Grav. at 15.56°C/15.56°C	0.7501			0.0001		1			05/20/2022 08:50	LWH

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# ANALYTICAL RESULTS

Lab ID: 3777040002	Date Collected: 05/17/2022 00:00	Matrix: Gasoline (G)
Sample ID: WEC	Date Received: 05/19/2022 07:01	Collector:
Description: Engine Fuel		

Parameter	Result	Qual	Unit	RL	MDL	DF	Min	Max	Analyzed	By
<b>Elemental Analysis by ASTM D5291 D [A]</b>										
Carbon (Wt%)	80.99		% m/m	0.05		1			05/19/2022 14:00	AJB
Hydrogen (Wt%)	13.45		% m/m	0.05		1			05/19/2022 14:00	AJB
<b>Elemental Analysis by ASTM D5453 [A]</b>										
Sulfur	3.6		ppm m/m	0.1		1			05/20/2022 09:32	AKL
Sulfur	0.00036		% m/m	0.00001		1			05/20/2022 09:32	AKL
<b>Elemental Analysis by ASTM D5622 A [A]</b>										
Oxygen (Wt%)	5.56		% m/m	0.05		1			05/24/2022 09:00	AJB
<b>Individual Parameters by ASTM D240 [A]</b>										
Gross Heating Value (BTU/lb)	18663		BTU/lb	315		1			05/25/2022 10:20	TXM
Gross Heating Value (MJ/kg)	43.411		MJ/kg			1			05/25/2022 10:20	TXM
Net Heating Value (BTU/lb)	17436		BTU/lb	315		1			05/25/2022 10:20	TXM
Net Heating Value (MJ/kg)	40.557		MJ/kg			1			05/25/2022 10:20	TXM
<b>Individual Parameters by ASTM D4052 [A]</b>										
API Gravity at 15.56°C	55.7		°API	0.1		1			05/20/2022 08:54	LWH
Density at 15.56°C	0.7552		g/mL	0.0001		1			05/20/2022 08:54	LWH
Spec. Grav. at 15.56°C/15.56°C	0.7559			0.0001		1			05/20/2022 08:54	LWH

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**MONTROSE AIR QUALITY SERVICES, LLC**  
Chain of Custody

*(15.56°C)*  
*Specific Gravity*

<b>Project Number</b>	<del>01527</del> (P) 015629	<b>Location</b>	Face, + Single Engine
<b>Client</b>	GM	<b>Date</b>	5/18/2022
<b>Plant</b>	Rushmore MI	<b>Completed By</b>	<i>[Signature]</i>

<b>Analysis Requested</b>	Carbon Hydrocarbon	Density / Specific Gravity	Organic by Pyrolysis	-Reignius Density	Disturbance Value	Reignius Eff/10	Sulfur - Reignius	Density / Specific Gravity
---------------------------	--------------------	----------------------------	----------------------	-------------------	-------------------	-----------------	-------------------	----------------------------

ID No.	Run No.	Date	Sample Description	Carbon Hydrocarbon	Density / Specific Gravity	Organic by Pyrolysis	-Reignius Density	Disturbance Value	Reignius Eff/10	Sulfur - Reignius	Density / Specific Gravity	Notes
WCC 3 (1)	1	5/18/2022	Engine Fuel	✓	✓	✓	✓	✓	✓	✓	✓	
WCC 3 (2)	1	5/18/2022	Engine Fuel	✓	✓	✓	✓	✓	✓	✓	✓	
WCC (1)	1	5/18/2022	Engine Fuel	✓	✓	✓	✓	✓	✓	✓	✓	
WCC (2)	1	5/18/2022	Engine Fuel	✓	✓	✓	✓	✓	✓	✓	✓	

<b>Relinquished By</b> (signature)	<i>Rachel Gribas</i>	<b>Relinquished By</b> (signature)	<i>[Signature]</i>	<b>Carrier</b>	
(printed)	Rachel Gribas	(printed)	Jeff Patsch	<b>Laboratory</b>	
<b>Date/Time</b>	5/18/2022 3:35 PM	<b>Date/Time</b>	5/18/2022 4:20 PM	<b>Contact</b>	
<b>Accepted By</b> (signature)	<i>[Signature]</i>	<b>Accepted By</b> (signature)	<i>[Signature]</i>	<b>Address</b>	
(printed)	Jeff Patsch	(printed)	Jeff Patsch	<b>Phone</b>	
<b>Date/Time</b>	5/18/2022 15:36	<b>Date/Time</b>	5-18-22 4:20 PM	<b>Fax</b>	
				<b>Date/Time</b>	

*Relinquished by Jeff Patsch Montrose Received by [Signature] 201am 5-19-22*



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Elk Grove Village, IL 60007  
Phone: (630) 860-4741

## **APPENDIX C**

# **QUALITY ASSURANCE/QUALITY CONTROL**

## **Appendix C.1 Units and Abbreviations**

## UNITS AND ABBREVIATIONS

@ X% O <sub>2</sub>	corrected to X% oxygen (corrected for dilution air)
CC	absolute value of the confidence coefficient
d	absolute value of the mean differences
°C	degrees Celsius (centigrade)
°F	degrees Fahrenheit
°R	degrees Rankine
" H <sub>2</sub> O	inches of water column
13.6	specific gravity of mercury
ΔH	pressure drop across orifice meter, inches H <sub>2</sub> O
ΔP	velocity head of stack gas, inches H <sub>2</sub> O
θ	total sampling time, minutes
μg	microgram
ρ <sub>a</sub>	density of acetone, mg/ml
ρ <sub>w</sub>	density of water, 0.9982 g/ml or 0.002201 lb/ml
acfm	actual cubic feet of gas per minute at stack conditions
A <sub>n</sub>	cross-sectional area of nozzle, ft <sup>2</sup>
A <sub>s</sub>	cross-sectional area of stack, square feet (ft <sup>2</sup> )
Btu	British thermal unit
B <sub>ws</sub>	proportion by volume of water vapor in gas stream
C <sub>a</sub>	particulate matter concentration in stack gas, gr/acf
C <sub>AVG</sub>	average unadjusted gas concentration, ppmv
C <sub>Dir</sub>	measured concentration of calibration gas, ppmv
cf or ft <sup>3</sup>	cubic feet
cfm	cubic feet per minute
C <sub>Gas</sub>	average gas concentration adjusted for bias, ppmv
C <sub>M</sub>	average of initial and final system bias check responses from upscale calibration gas, ppmv
cm or m <sup>3</sup>	cubic meters
C <sub>MA</sub>	actual concentration of the upscale calibration gas, ppmv
C <sub>O</sub>	average of initial and final system bias check responses from low-level calibration gas, ppmv
C <sub>p</sub>	pitot tube coefficient
C <sub>s</sub>	particulate matter concentration in stack gas, gr/dscf
CS	calibration span, % or ppmv
C <sub>S</sub>	measured concentration of calibration gas, ppmv
C <sub>V</sub>	manufactured certified concentration of calibration gas, ppmv
D	drift assessment, % of span
dcf	dry cubic feet
dcm	dry cubic meters
D <sub>n</sub>	diameter of nozzle, inches
D <sub>s</sub>	diameter of stack, inches
dscf	dry standard cubic feet
dscfm	dry standard cubic feet per minute
dscm	dry standard cubic meters
F <sub>d</sub>	F-factor, dscf/MMBtu of heat input
fpm	feet per minute
fps	feet per second
ft	feet
ft <sup>2</sup>	square feet
g	gram
gal	gallons
gr	grains (7000 grains per pound)

## UNITS AND ABBREVIATIONS

gr/dscf	grains per dry standard cubic feet
hr	hour
I	percent of isokinetic sampling
in	inch
k	kilo or thousand (metric units, multiply by 10 <sup>3</sup> )
K	kelvin (temperature)
K <sub>3</sub>	conversion factor 0.0154 gr/mg
K <sub>4</sub>	conversion factor 0.002668 ((in. Hg)(ft <sup>3</sup> ))/((ml)(°R))
kg	kilogram
K <sub>p</sub>	pitot tube constant (85.49 ft/sec)
kwscfh	thousand wet standard cubic feet per hour
l	liters
lb/hr	pounds per hour
lb/MMBtu	pounds per million Btu
lpm	liters per minute
m	meter or milli
M	thousand (English units) or mega (million, metric units)
m <sup>3</sup>	cubic meters
m <sub>a</sub>	mass of residue of acetone after evaporation, mg
M <sub>d</sub>	molecular weight of stack gas; dry basis, lb/lb-mole
meq	milliequivalent
mg	milligram
Mg	megagram (10 <sup>6</sup> grams)
min	minute
ml or mL	milliliter
mm	millimeter
MM	million (English units)
MMBtu/hr	million Btu per hour
m <sub>n</sub>	total amount of particulate matter collected, mg
mol	mole
mol. wt. or MW	molecular weight
M <sub>s</sub>	molecular weight of stack gas; wet basis, lb/lb-mole
MW	molecular weight or megawatt
n	number of data points
ng	nanogram
nm	nanometer
P <sub>bar</sub>	barometric pressure, inches Hg
pg	picogram
P <sub>g</sub>	stack static pressure, inches H <sub>2</sub> O
P <sub>m</sub>	barometric pressure of dry gas meter, inches Hg
ppb	parts per billion
ppbv	parts per billion, by volume
ppbvd	parts per billion by volume, dry basis
ppm	parts per million
ppmv	parts per million, by volume
ppmvd	parts per million by volume, dry basis
P <sub>s</sub>	absolute stack gas pressure, inches Hg
psi	pounds per square inch
psia	pounds per square inch absolute
psig	pounds per square inch gauge
P <sub>std</sub>	standard absolute pressure, 29.92 inches Hg
Q <sub>a</sub>	volumetric flow rate, actual conditions, acfm

## UNITS AND ABBREVIATIONS

$Q_s$	volumetric flow rate, standard conditions, scfm
$Q_{std}$	volumetric flow rate, dry standard conditions, dscfm
R	ideal gas constant 21.85 ((in. Hg) (ft <sup>3</sup> )/((°R) (lbmole))
SB <sub>final</sub>	post-run system bias check, % of span
SB <sub>i</sub>	pre-run system bias check, % of span
scf	standard cubic feet
scfh	standard cubic feet per hour
scfm	standard cubic feet per minute
scm	standard cubic meters
scmh	standard cubic meters per hour
sec	second
sf, sq. ft., or ft <sup>2</sup>	square feet
std	standard
t	metric ton (1000 kg)
T <sub>0.975</sub>	t-value
T <sub>a</sub>	absolute average ambient temperature, °R (+459.67 for English)
T <sub>m</sub>	absolute average dry gas meter temperature, °R (+459.67 for English)
ton or t	ton = 2000 pounds
tph or tons/hr	tons per hour
tpy or tons/yr	tons per year
T <sub>s</sub>	absolute average stack gas meter temperature, °R (+459.67 for English)
T <sub>std</sub>	absolute temperature at standard conditions
V	volt
V <sub>a</sub>	volume of acetone blank, ml
V <sub>aw</sub>	volume of acetone used in wash, ml
V <sub>lc</sub>	total volume H <sub>2</sub> O collected in impingers and silica gel, grams
V <sub>m</sub>	volume of gas sampled through dry gas meter, ft <sup>3</sup>
V <sub>m(std)</sub>	volume of gas measured by the dry gas meter, corrected to standard conditions, dscf
V <sub>ma</sub>	stack gas volume sampled, acf
V <sub>n</sub>	volume collected at stack conditions through nozzle, acf
V <sub>s</sub>	average stack gas velocity, feet per second
V <sub>wc(std)</sub>	volume of water vapor condensed, corrected to standard conditions, scf
V <sub>wi(std)</sub>	volume of water vapor in gas sampled from impingers, scf
V <sub>wsg(std)</sub>	volume of water vapor in gas sampled from silica gel, scf
W	watt
W <sub>a</sub>	weight of residue in acetone wash, mg
W <sub>imp</sub>	total weight of impingers, grams
W <sub>sg</sub>	total weight of silica gel, grams
Y	dry gas meter calibration factor, dimensionless

## ACRONYMS

AAS	atomic absorption spectroscopy
ACDP	air contaminant discharge permit
ACE	analyzer calibration error, percent of span
AD	absolute difference
ADL	above detection limit
AETB	Air Emissions Testing Body
AS	applicable standard (emission limit)
ASTM	American Society For Testing And Materials
BACT	best achievable control technology
BDL	below detection limit
BHP	brake horsepower
BIF	boiler and industrial furnace
BLS	black liquor solids
CC	confidence coefficient
CD	calibration drift
CE	calibration error
CEM	continuous emissions monitor
CEMS	continuous emissions monitoring system
CERMS	continuous emissions rate monitoring system
CET	calibration error test
CFR	Code of Federal Regulations
CGA	cylinder gas audit
CHNOS	elemental analysis for determination of C, H, N, O, and S content in fuels
CNCG	concentrated non-condensable gas
CO	catalytic oxidizer
COC	chain of custody
COMS	continuous opacity monitoring system
CPM	condensible particulate matter
CPMS	continuous parameter monitoring system
CT	combustion turbine
CTM	conditional test method
CTO	catalytic thermal oxidizer
CVAAS	cold vapor atomic absorption spectroscopy
D <sub>e</sub>	equivalent diameter
DE	destruction efficiency
Dioxins	polychlorinated dibenzo-p-dioxins (pcdd's)
DLL	detection level limited
DNCG	dilute non-condensable gas
ECD	electron capture detector
EIT	Engineer In Training
ELCD	electroconductivity detector (hall detector)
EMPC	estimated maximum possible concentration
EPA	US Environmental Protection Agency
EPRI	Electric Power Research Institute
ES	emission standard (applicable limit)
ESP	electrostatic precipitator
EU	emission unit
FCCU	fluid catalytic cracking unit
FGD	flue gas desulfurization
FI	flame ionization
FIA	flame ionization analyzer
FID	flame ionization detector
FPD	flame photometric detector
FPM	filterable particulate matter



## ACRONYMS

FTIR	Fourier-transform infrared spectroscopy
FTPB	field train proof blank
FTRB	field train recovery blank
Furans	polychlorinated dibenzofurans (pcdf's)
GC	gas chromatography
GC/MS	gas chromatography/mass spectroscopy
GFAAS	graphite furnace atomic absorption spectroscopy
GFC	gas filter correlation
GHG	greenhouse gas
HAP	hazardous air pollutant
HC	hydrocarbons
HHV	higher heating value
HPLC	high performance liquid chromatography
HRGC/HRMS	high-resolution gas chromatography/high-resolution mass spectroscopy
HRSG	heat recovery steam generator
IC	ion chromatography
ICAP	inductively-coupled argon plasmography
ICPCR	ion chromatography with a post-column reactor
ICP-MS	inductively coupled plasma-mass spectroscopy
IR	infrared radiation
ISO	International Standards Organization
kW	kilowatts
LFG	landfill gas
LHV	lower heating value
LPG	liquified petroleum gas
MACT	maximum achievable control technology
MDI	methylene diphenyl diisocyanate
MDL	method detection limit
MNOC	maximum normal operating conditions
MRL	method reporting limit
MS	mass spectrometry
NA	not applicable or not available
NCASI	National Council For Air And Steam Improvement
NCG	non-condensable gases
ND	not detected
NDIR	non-dispersive infrared
NESHAP	National Emissions Standards For Hazardous Air Pollutants
NG	natural gas
NIOSH	National Institute For Occupational Safety And Health
NIST	National Institute Of Standards And Technology
NMC	non-methane cutter
NMOC	non-methane organic compounds
NMVOC	non-methane volatile organic compounds
NPD	nitrogen phosphorus detector
NSPS	New Source Performance Standards
OSHA	Occupational Safety And Health Administration
PAH	polycyclic aromatic hydrocarbons
PCB	polychlorinated biphenyl compounds
PCWP	plywood and composite wood products
PE	Professional Engineer
PFAS	per- and polyfluoroalkyl substances (PFAS)
PI	photoionization
PID	photoionization detector
PM	particulate matter

## ACRONYMS

PM <sub>10</sub>	particulate matter less than 10 microns in aerodynamic diameter
PM <sub>2.5</sub>	particulate matter less than 2.5 microns in aerodynamic diameter
POM	polycyclic organic matter
PS	performance specification
PSD	particle size distribution
PSEL	plant site emission limits
PST	performance specification test
PTE	permanent total enclosure
PTM	performance test method
QA/QC	quality assurance and quality control
QI	Qualified Individual
QSTI	Qualified Source Testing Individual
RA	relative accuracy
RAA	relative accuracy audit
RACT	reasonably available control technology
RATA	relative accuracy test audit
RCTO	rotary concentrator thermal oxidizer
RICE	stationary reciprocating internal combustion engine
RM	reference method
RTO	regenerative thermal oxidizer
SAM	sulfuric acid mist
SCD	sulfur chemiluminescent detector
SCR	selective catalytic reduction system
SD	standard deviation
Semi-VOST	semivolatile organic compounds sample train
SRM	standard reference material
TAP	toxic air pollutant
TBD	to be determined
TCA	thermal conductivity analyzer
TCD	thermal conductivity detector
TGNENMOC	total gaseous non-ethane non-methane organic compounds
TGNMOC	total gaseous non-methane organic compounds
TGOC	total gaseous organic compounds
THC	total hydrocarbons
TIC	tentatively identified compound
TO	thermal oxidizer
TO	toxic organic (as in EPA Method TO-15)
TPM	total particulate matter
TSP	total suspended particulate matter
TTE	temporary total enclosure
ULSD	ultra-low sulfur diesel
UV	ultraviolet radiation range
VE	visible emissions
VOC	volatile organic compounds
VOST	volatile organic sample train
WC	water column
WWTP	waste water treatment plant

## CHEMICAL NOMENCLATURE

Ag	silver	Se	selenium
As	arsenic	SO <sub>2</sub>	sulfur dioxide
Ba	barium	SO <sub>3</sub>	sulfur trioxide
Be	beryllium	SO <sub>x</sub>	sulfur oxides
C	carbon	TCDD	tetrachlorodibenzodioxin
Cd	cadmium	TCDF	tetrachlorodibenzofuran
CdS	cadmium sulfide	TGOC	total gaseous organic concentration
CH <sub>2</sub> O	formaldehyde	THC	total hydrocarbons
CH <sub>3</sub> CHO	acetaldehyde	TI	thallium
CH <sub>3</sub> OH	methanol	TRS	total reduced sulfur compounds
CH <sub>4</sub>	methane	Zn	zinc
C <sub>2</sub> H <sub>4</sub> O	ethylene oxide		
C <sub>2</sub> H <sub>6</sub>	ethane		
C <sub>3</sub> H <sub>4</sub> O	acrolein		
C <sub>3</sub> H <sub>6</sub> O	propionaldehyde		
C <sub>3</sub> H <sub>8</sub>	propane		
C <sub>6</sub> H <sub>5</sub> OH	phenol		
Cl <sub>2</sub>	chlorine		
ClO <sub>2</sub>	chlorine dioxide		
CO	carbon monoxide		
Co	cobalt		
CO <sub>2</sub>	carbon dioxide		
Cr	chromium		
Cu	copper		
ETO	ethylene oxide		
EtOH	ethyl alcohol (ethanol)		
H <sub>2</sub>	hydrogen		
H <sub>2</sub> O	water		
H <sub>2</sub> O <sub>2</sub>	hydrogen peroxide		
H <sub>2</sub> S	hydrogen sulfide		
H <sub>2</sub> SO <sub>4</sub>	sulfuric acid		
HCl	hydrogen chloride		
Hg	mercury		
IPA	isopropyl alcohol		
MDI	methylene diphenyl diisocyanate		
MeCl <sub>2</sub>	methylene chloride		
MEK	methyl ethyl ketone		
MeOH	methanol		
Mn	manganese		
N <sub>2</sub>	nitrogen		
NH <sub>3</sub>	ammonia		
Ni	nickel		
NO	nitric oxide		
NO <sub>2</sub>	nitrogen dioxide		
NO <sub>x</sub>	nitrogen oxides		
O <sub>2</sub>	oxygen		
P	phosphorus		
Pb	lead		
PCDD	polychlorinated dibenzo-p-dioxins		
PCDF	polychlorinated dibenzofurans		
Sb	antimony		

## **Appendix C.2**

### **QA/QC Data**

Date		
5/17/2022		
Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
<b>Zero</b>	0.01	1.59
<b>High</b>	20.21	1,999
<b>Mid</b>	10.12	906.6
<hr/>		
7:58:42	0.01	883.5
7:58:57	0.03	887.1
7:59:12	-0.01	887.1
7:59:27	0.01	889.5
7:59:42	0.01	891.3
7:59:57	0.01	894.3
8:00:12	7.47	924.5
8:00:27	19.51	903.3
8:00:42	20.14	864.3
8:00:57	20.16	806.4
8:01:12	20.15	486.0
8:01:27	20.17	370.1
8:01:42	20.2	348.4
8:01:57	20.18	16.60
8:02:12	20.16	4.76
8:02:27	20.18	4.84
8:02:42	20.16	4.11
8:02:57	20.16	3.16
8:03:12	20.18	3.37
8:03:27	20.17	2.89
8:03:42	20.17	2.72
8:03:57	20.20	3.17
8:04:12	20.20	2.46
8:04:27	20.20	1.75
8:04:42	20.21	2.48
8:04:57	20.19	1.52
8:05:12	20.23	3.14
8:05:27	20.22	2.86
8:05:42	20.19	1.50
8:05:57	17.09	1.49
8:06:12	12.07	1.64
8:06:27	15.85	1.73
8:06:42	10.37	1.70
8:06:57	10.14	2.56
8:07:12	10.12	1.40
8:07:27	10.11	1.35
8:07:42	10.09	1.54
8:07:57	8.74	1.66
8:08:12	1.40	270.4
8:08:27	0.11	1010
8:08:42	0.11	1010
8:08:57	0.1	1979
8:09:12	0.12	2057
8:09:27	0.12	2087
8:09:42	0.13	2098
8:09:57	0.13	2101
8:10:12	0.13	2102
8:10:27	0.11	2100
8:10:42	0.11	2072
8:10:57	0.11	1988
8:11:12	0.09	1982
8:11:27	0.08	1980
8:11:42	0.07	1980
8:11:57	0.08	1986
8:12:12	0.07	1990
8:12:27	0.10	1995
8:12:42	1.61	2001
8:12:57	0.66	2000
8:13:12	0.06	1999
8:13:27	0.06	1913
8:13:42	0.08	1798
8:13:57	0.06	1297
8:14:12	0.04	926.4

Date		
5/17/2022		
Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
<b>Zero</b>	0.01	1.59
<b>High</b>	20.21	1,999
<b>Mid</b>	10.12	906.6
<hr/>		
8:14:27	0.04	911.0
8:14:42	0.04	908.0
8:14:57	0.06	908.9
8:15:12	0.04	906.9
8:15:27	0.05	907.3
8:15:42	0.04	906.7
8:15:57	0.38	905.7
8:16:12	0.93	886.9

Date  
5/17/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
<b>Zero</b>	0.11	5.3
<b>High</b>	10.04	895.4
<b>Mid</b>	NA	NA
<b>Low</b>	NA	NA
<hr/>		
8:16:42	8.20	892.3
8:16:57	12.07	885.1
8:17:12	2.56	806.9
8:17:27	0.18	739.0
8:17:42	0.14	853.4
8:17:57	0.13	870.6
8:18:12	0.12	873.7
8:18:27	0.11	890.2
8:18:42	0.11	892.5
8:18:57	0.09	893.5
8:19:12	0.09	895.2
8:19:27	0.08	895.2
8:19:42	0.11	896.7
8:19:57	0.10	895.1
8:20:12	0.08	894.6
8:20:27	1.17	895.3
8:20:42	8.24	888.9
8:20:57	9.92	867.0
8:21:12	9.95	839.4
8:21:27	9.98	632.3
8:21:42	9.99	449.9
8:21:57	10.01	98.39
8:22:12	10.04	17.60
8:22:27	10.06	9.75
8:22:42	10.03	6.99
8:22:57	10.04	6.42
8:23:12	10.04	5.52
8:23:27	10.03	5.28
8:23:42	10.04	5.45
8:23:57	10.03	5.13
8:24:12	10.05	5.14

Date	5/19/2022
Time	NO <sub>x</sub> (ppm)
Average	203.6
Minimum	202.1
Maximum	205.3
% Difference	1.57
<hr/>	
15:01	205.12
15:02	205.01
15:03	204.53
15:04	205.13
15:05	204.70
15:06	204.81
15:07	205.26
15:08	204.94
15:09	204.59
15:10	204.53
15:11	203.17
15:12	203.28
15:13	204.10
15:14	203.31
15:15	203.15
15:16	204.07
15:17	204.39
15:18	202.56
15:19	202.48
15:20	202.07
15:21	202.13
15:22	203.16
15:23	202.59
15:24	203.16
15:25	202.24
15:26	202.79
15:27	202.67
15:28	202.26
15:29	202.45
15:30	202.32



Date  
5/17/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
<b>Zero</b>	0.13	7.2
<b>Upscale</b>	10.03	881.6

11:09:34	10.02	10.02
11:09:49	10.03	8.44
11:10:04	10.03	7.60
11:10:19	10.03	7.98
11:10:34	10.03	7.99
11:10:49	10.03	8.02
11:11:04	10.03	7.20
11:11:19	10.24	7.91
11:11:34	14.08	7.22
11:11:49	6.34	6.66
11:12:04	0.39	145.9
11:12:19	0.18	428.6
11:12:34	0.18	573.9
11:12:49	0.16	863.9
11:13:04	0.16	872.2
11:13:19	0.14	880.3
11:13:34	0.12	881.1
11:13:49	0.13	882.4
11:14:04	0.12	882.7
11:14:19	0.11	880.2
11:14:34	0.10	877.5

Date  
5/17/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Zero	0.13	6.6
Upscale	10.03	880.0

12:42:26	10.01	9.97
12:42:41	10.02	8.06
12:42:56	10.06	9.53
12:43:11	10.03	6.84
12:43:26	10.03	6.72
12:43:41	10.03	6.40
12:43:56	10.03	6.62
12:44:11	10.03	6.33
12:44:26	10.04	6.88
12:44:41	10.11	6.22
12:44:56	10.09	5.00
12:45:11	1.69	228.2
12:45:26	0.23	422.8
12:45:41	0.19	795.8
12:45:56	0.17	853.3
12:46:11	0.15	856.7
12:46:26	0.13	874.7
12:46:41	0.13	878.3
12:46:56	0.13	879.4
12:47:11	0.13	881.4
12:47:26	0.12	881.7
12:47:41	0.10	877.5
12:47:56	0.14	879.3
12:48:11	0.12	878.2

Date  
5/17/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Zero	0.16	7.6
Upscale	10.04	874.9

14:15:29	10.02	7.52
14:15:44	10.02	7.49
14:15:59	10.05	7.98
14:16:14	10.06	7.77
14:16:29	10.06	7.26
14:16:44	10.06	6.27
14:16:59	10.08	7.43
14:17:14	10.97	6.65
14:17:29	4.83	5.71
14:17:44	0.31	228.9
14:17:59	0.22	424.6
14:18:14	0.20	655.0
14:18:29	0.18	856.9
14:18:44	0.17	868.4
14:18:59	0.16	871.9
14:19:14	0.15	872.9
14:19:29	0.16	874.9
14:19:44	0.13	875.4
14:19:59	0.12	875.6
14:20:14	0.14	873.6
14:20:29	0.13	870.6
14:20:44	0.13	870.3

Date 5/18/2022		
Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Zero	0.04	0.4
High	20.15	1,987.0
Mid	9.94	908.3
<hr/>		
8:31:21	20.77	-1.22
8:31:36	20.73	-1.61
8:31:51	20.75	-0.55
8:32:06	20.74	-1.19
8:32:21	20.73	-1.42
8:32:36	20.77	0.53
8:32:51	20.47	0.30
8:33:06	14.65	-1.41
8:33:21	13.30	-0.64
8:33:36	13.53	-1.15
8:33:51	13.75	-0.88
8:34:06	14.11	-0.98
8:34:21	14.51	-1.51
8:34:36	14.87	-0.99
8:34:51	15.13	-1.16
8:35:06	15.23	-1.63
8:35:21	16.11	-1.24
8:35:36	20.49	-0.86
8:35:51	20.74	-0.56
8:36:06	20.73	-1.36
8:36:21	20.68	-0.51
8:36:36	20.52	-0.61
8:36:51	20.36	-1.87
8:37:06	20.24	-0.63
8:37:21	20.18	-0.6
8:37:36	20.20	-1.19
8:37:51	20.39	-1.19
8:38:06	21.23	-0.2
8:38:21	21.22	-1.2
8:38:36	21.22	-1.26
8:38:51	21.23	-0.75
8:39:06	21.22	-0.54
8:39:21	21.16	-0.52
8:39:36	21.07	-1.14
8:39:51	21.01	-1.21
8:40:06	20.94	-1.00
8:40:21	20.94	-0.11
8:40:36	20.93	-0.62
8:40:51	20.95	1.59
8:41:06	21.00	1.63
8:41:21	21.19	0.27
8:41:36	21.00	0.36
8:41:51	20.15	0.64
8:42:06	20.15	0.36
8:42:21	20.16	0.80
8:42:36	20.16	1.22
8:42:51	20.14	0.05
8:43:06	19.54	0.28
8:43:21	11.76	0.17
8:43:36	9.96	-0.08
8:43:51	9.96	0.33
8:44:06	9.95	1.00
8:44:21	9.93	0.25
8:44:36	9.92	0.02
8:44:51	10.09	0.65
8:45:06	11.41	0.62
8:45:21	0.92	0.09
8:45:36	-0.15	758.7
8:45:51	-0.14	1077
8:46:06	-0.16	1913
8:46:21	-0.15	1925
8:46:36	-0.17	1942
8:46:51	-0.19	1954

Date  
5/18/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Zero	0.04	0.4
High	20.15	1,987.0
Mid	9.94	908.3
<hr/>		
8:47:06	-0.19	1960
8:47:21	-0.15	1966
8:47:36	-0.19	1965
8:47:51	-0.18	1964
8:48:06	-0.17	1958
8:48:21	-0.17	1956
8:48:36	-0.17	1956
8:48:51	-0.15	1956
8:49:06	-0.18	1956
8:49:21	-0.17	1957
8:49:36	-0.19	1958
8:49:51	-0.19	1989
8:50:06	-0.19	1989
8:50:21	-0.17	1987
8:50:36	-0.16	1985
8:50:51	-0.14	1986
8:51:06	-0.18	1987
8:51:21	-0.19	1987
8:51:36	-0.19	1988
8:51:51	-0.05	1991
8:52:06	0.09	2000
8:52:21	0.07	1997
8:52:36	0.06	1956
8:52:51	-0.08	1907
8:53:06	-0.23	1397
8:53:21	-0.24	924.1
8:53:36	-0.24	904.0
8:53:51	-0.22	900.5
8:54:06	-0.23	896.8
8:54:21	-0.24	895.1
8:54:36	-0.24	895.2
8:54:51	-0.22	896.1
8:55:06	-0.24	893.1
8:55:21	-0.24	891.3
8:55:36	-0.23	892.0
8:55:51	-0.23	891.9
8:56:06	-0.23	893.0
8:56:21	-0.24	898.0
8:56:36	-0.25	908.6
8:56:51	-0.23	908.5
8:57:06	-0.24	909.0
8:57:21	-0.24	908.0
8:57:36	-0.23	907.6
8:57:51	-0.24	908.1

Date  
5/18/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Zero	-0.19	6.0
High	9.94	908.6
Mid	NA	NA
Low	NA	NA

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9:08:11	-0.19	912.0
9:08:26	-0.20	910.3
9:08:41	-0.18	910.3
9:08:56	-0.19	909.7
9:09:11	-0.18	908.5
9:09:26	-0.18	906.0
9:09:41	-0.20	905.5
9:09:56	-0.20	905.2
9:10:11	-0.09	906.1
9:10:26	8.66	905.1
9:10:41	12.59	902.0
9:10:56	9.73	880.4
9:11:11	9.81	742.7
9:11:26	9.82	743.3
9:11:41	9.84	465.0
9:11:56	9.93	356.2
9:12:11	10.05	96.16
9:12:26	10.06	11.37
9:12:41	9.95	7.71
9:12:56	9.93	7.00
9:13:11	9.93	5.87
9:13:26	9.94	6.37
9:13:41	9.93	5.75
9:13:56	9.93	5.83

Date  
5/18/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Zero	-0.16	6.7
Upscale	9.92	890.9

11:27:31	9.90	9.51
11:27:46	9.91	8.55
11:28:01	9.92	8.37
11:28:16	9.93	8.47
11:28:31	9.92	8.22
11:28:46	9.92	7.02
11:29:01	9.91	6.67
11:29:16	6.67	5.05
11:29:31	3.28	168.8
11:29:46	0.34	313.0
11:30:01	-0.10	399.4
11:30:16	-0.12	751.1
11:30:31	-0.14	777.4
11:30:46	-0.15	886.9
11:31:01	-0.15	889.8
11:31:16	-0.16	892.1
11:31:31	-0.18	890.8
11:31:46	-0.19	891.1

Date  
5/18/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Zero	-0.16	7.2
Upscale	9.91	884.9

12:44:07	9.89	11.38
12:44:22	9.90	9.99
12:44:37	9.91	8.79
12:44:52	9.93	8.26
12:45:07	9.91	6.74
12:45:22	9.93	7.38
12:45:37	9.91	6.57
12:45:52	9.94	9.11
12:46:07	8.09	6.28
12:46:22	2.99	231.4
12:46:37	-0.01	363.4
12:46:52	-0.11	682.0
12:47:07	-0.13	733.6
12:47:22	-0.13	879.8
12:47:37	-0.15	882.9
12:47:52	-0.15	886.3
12:48:07	-0.17	886.5
12:48:22	-0.15	884.0
12:48:37	-0.16	874.3
12:48:52	-0.15	876.9



Date  
5/18/2022

Time	O <sub>2</sub> (%)	NO <sub>x</sub> (ppm)
Zero	-0.16	6.8
Upscale	9.90	880.1

14:10:56	9.9	8.67
14:11:11	9.89	7.87
14:11:26	9.91	7.51
14:11:41	9.9	6.71
14:11:56	9.92	6.6
14:12:11	9.92	7.02
14:12:26	9.93	6.95
14:12:41	9.93	7.19
14:12:56	9.52	5.55
14:13:11	3.83	87.6
14:13:26	0.05	420.02
14:13:41	-0.13	648.77
14:13:56	-0.14	850.27
14:14:11	-0.15	862.49
14:14:26	-0.15	878.28
14:14:41	-0.15	879.71
14:14:56	-0.16	880.65
14:15:11	-0.15	881.69
14:15:26	-0.16	872.82
14:15:41	-0.18	867.15

Date: 10-18-2017

 Name: David Wagner

 Analyzer: Type / Model: Viasala CO2/O2 Cells, Teledyne T100, T200, T300

Method Referenced: EPA Method 7E

**O2 Results:**

Test Gas	Concentration, ppmv or %	Analyzer Output Response ppmv	Interference % of Span (21.46 %)
SO <sub>2</sub>	27.46	-0.01	0.046
CO <sub>2</sub>	5.02	0.02	0.093
NO <sub>x</sub>	125.5	0.02	0.093
CO	126.5	0.02	0.093
Ch <sub>4</sub>	301.3	-0.01	0.046

 A Calibration Cylinder containing 21.46 % O<sub>2</sub> was used to Span Analyzer

**Results:**

Test Gas	Sum of Absolute Differences	Sum of Individual Gases Percent Interferences	Max Allowable Percent of Span Interference (%)
O <sub>2</sub>	0.08	0.371	2.5

**CO<sub>2</sub> Results:**

Test Gas	Concentration, ppmv or %	Analyzer Output Response %	Interference % of Span (18.01%)
SO <sub>2</sub>	27.02	-0.001	.006
O <sub>2</sub>	21.05	-0.003	.017
CO	124.7	0.290	1.6
NO	47.89	0.000	0.000
NO <sub>2</sub>	50.08	-0.001	0.006
Ch <sub>4</sub>	50.66	-0.001	0.006

A Calibration Cylinder containing 18.01% Carbon Dioxide was used to Span Analyzer

**Results:**

Test Gas	Sum of Absolute Differences %	Sum of Individual Gases % Interferences	Max Allowable Percent of Span Interference (%)
CO <sub>2</sub>	0.296	1.635	2.5

\*data collected from S:\Portland\Company\Calibrations\Analyzers\Interference Response Checks\CO CO2 Interference Check Teledyne T300M

**Thermo Scientific Model 42 NO-NO<sub>2</sub>-NO<sub>x</sub> Analyzer Potential Interference Gas Responses**

<i>Potential Interferent</i>		<i>Model 42iLS</i>			<i>Model 42iHL</i>		
<i>Test Gas</i>	<i>Concentration</i>	<i>NO</i>	<i>NO<sub>2</sub></i>	<i>NO<sub>x</sub></i>	<i>NO</i>	<i>NO<sub>2</sub></i>	<i>NO<sub>x</sub></i>
CO <sub>2</sub>	5.20%	0.001	0.004	0.004	0.001	0.003	0.004
CO <sub>2</sub>	15.60%	0	0.003	0.003	0.001	0.004	0.005
H <sub>2</sub> O	1.00%	0	0	0	0.003	0.001	0.004
NO	15 ppm	14.9	0.1	15	15	-0.06	14.99
NO <sub>2</sub>	15 ppm	1.1	14	15	0.4	14.6	15
N <sub>2</sub> O	10 ppm	0	0	0	0	0	0
CO	50 ppm	0	0	0	0	0	0
SO <sub>2</sub>	21 ppm	-0.01	0	-0.01	0.007	0	0.007
CH <sub>4</sub>	50 ppm	0	0	0	0	0	0
HCl	10 ppm	0	0.006	0.006	0	0.004	0.004
NH <sub>3</sub> <sup>1</sup>	10 ppm	0	0	0	0.17	8.9	9.1
<b>Sum of Responses</b>		<b>0.011</b>	<b>0.01</b>	<b>0.02</b>	<b>0.011</b>	<b>0.009</b>	<b>0.02</b>
<b>Span Value</b>		<b>160</b>	<b>152</b>	<b>160</b>	<b>160</b>	<b>152</b>	<b>160</b>
<b>% of Calibration Span</b>		<b>0.01%</b>	<b>0.01%</b>	<b>0.01%</b>	<b>0.01%</b>	<b>0.01%</b>	<b>0.01%</b>

Acceptance Criteria found in Section 13.4 of Method 7E is the sum of responses must not be greater than 2.5% of the analyzer calibration span value.

<sup>1</sup>NH<sub>3</sub> interferent results shown for the Model 42iHL was not used in calculation of interference response check because it is a known interferent with an approximate 1 ppm to 1 ppm positive bias in analyzers using stainless steel NO<sub>2</sub> to NO converters. Thermo recommends that NO<sub>x</sub> analyzers with stainless steel NO<sub>2</sub> to NO converters must use a NH<sub>3</sub> scrubber when testing sources with potential NH<sub>3</sub> in the flue gas.

This document is subject to change without notice.

## CERTIFICATE OF ANALYSIS

### Grade of Product: EPA Protocol

Part Number: E03NI75E15A1104	Reference Number: 54-401455479-1
Cylinder Number: CC720472	Cylinder Volume: 148.9 CF
Laboratory: 124 - Chicago (SAP) - IL	Cylinder Pressure: 2015 PSIG
PGVP Number: B12019	Valve Outlet: 590
Gas Code: CO2,O2,BALN	Certification Date: Mar 29, 2019

**Expiration Date: Mar 29, 2027**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

ANALYTICAL RESULTS					
Component	Requested Concentration	Actual Concentration	Protocol Method	Total Relative Uncertainty	Assay Dates
CARBON DIOXIDE	5.000 %	4.982 %	G1	+/- 0.5% NIST Traceable	03/29/2019
OXYGEN	20.00 %	20.12 %	G1	+/- 0.4% NIST Traceable	03/29/2019
NITROGEN	Balance				

CALIBRATION STANDARDS					
Type	Lot ID	Cylinder No	Concentration	Uncertainty	Expiration Date
NTRM	10060138	CC308178	5.027 % CARBON DIOXIDE/NITROGEN	+/- 0.4%	Dec 02, 2021
NTRM	15010420	K027067	22.454 % OXYGEN/NITROGEN	+/- 0.2%	Aug 05, 2021

ANALYTICAL EQUIPMENT		
Instrument/Make/Model	Analytical Principle	Last Multipoint Calibration
CO2-1 HORIBA VIA-510 V1E3H7P5	NDIR	Mar 26, 2019
O2-1 HORIBA MPA-510 3VUYL9NR	Paramagnetic	Mar 23, 2019

Triad Data Available Upon Request



Signature on file

Approved for Release

# CERTIFICATE OF ANALYSIS

## Grade of Product: EPA PROTOCOL STANDARD

Part Number:	E03NI80E15A0138	Reference Number:	54-402217719-1
Cylinder Number:	CC161601	Cylinder Volume:	150.9 CF
Laboratory:	124 - Chicago (SAP) - IL	Cylinder Pressure:	2015 PSIG
PGVP Number:	B12021	Valve Outlet:	590
Gas Code:	CO2,O2,BALN	Certification Date:	Sep 13, 2021

**Expiration Date: Sep 13, 2029**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a mole/mole basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

ANALYTICAL RESULTS					
Component	Requested Concentration	Actual Concentration	Protocol Method	Total Relative Uncertainty	Assay Dates
CARBON DIOXIDE	10.00 %	9.922 %	G1	+/- 0.7% NIST Traceable	09/13/2021
OXYGEN	10.00 %	10.02 %	G1	+/- 0.8% NIST Traceable	09/13/2021
NITROGEN	Balance				

CALIBRATION STANDARDS					
Type	Lot ID	Cylinder No	Concentration	Uncertainty	Expiration Date
NTRM	08010601	K002531	13.94 % CARBON DIOXIDE/NITROGEN	+/- 0.6%	Jan 30, 2024
NTRM	98051012	SG9159596BAL	12.05 % OXYGEN/NITROGEN	+/- 0.7%	Dec 14, 2023

ANALYTICAL EQUIPMENT		
Instrument/Make/Model	Analytical Principle	Last Multipoint Calibration
CO2-1 HORIBA VIA-510 V1E3H7P5	NDIR	Aug 20, 2021
O2-1 HORIBA MPA-510 3VUYL9NR	Paramagnetic	Aug 27, 2021

Triad Data Available Upon Request

Signature on file

Approved for Release  
MW023AS-015629-RT-1395

## CERTIFICATE OF ANALYSIS

### Grade of Product: EPA Protocol

Customer: BT ENVIRONMENTAL CONSULTING  
 Part Number: E02NI99E15A0124 Reference Number: 32-401502188-1  
 Cylinder Number: CC284861 Cylinder Volume: 144.4 CF  
 Laboratory: 112 - Troy-32 (SAP) - MI Cylinder Pressure: 2015 PSIG  
 PGVP Number: B62019 Valve Outlet: 660  
 Gas Code: NO,NOX,BALN Certification Date: May 29, 2019

**Expiration Date: May 29, 2027**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

#### ANALYTICAL RESULTS

Component	Requested Concentration	Actual Concentration	Protocol Method	Total Relative Uncertainty	Assay Dates
NOX	2000 PPM	1987 PPM	G1	+/- 0.7% NIST Traceable	05/21/2019, 05/29/2019
NITRIC OXIDE	2000 PPM	1982 PPM	G1	+/- 0.6% NIST Traceable	05/21/2019, 05/29/2019
NITROGEN	Balance				

#### CALIBRATION STANDARDS

Type	Lot ID	Cylinder No	Concentration	Uncertainty	Expiration Date
NTRM	09010125	KAL003328	2954 PPM NITRIC OXIDE/NITROGEN	+/- 0.5%	Oct 05, 2021
PRM	C1305910.02	D562881	30.0 PPM NITROGEN DIOXIDE/NITROGEN	+/-2.0%	Sep 04, 2018
GMIS	7292017110	CC511376	29.97 PPM NITROGEN DIOXIDE/NITROGEN	+/-2.0%	Mar 06, 2021

The SRM, PRM or RGM noted above is only in reference to the GMIS used in the assay and not part of the analysis.

#### ANALYTICAL EQUIPMENT

Instrument/Make/Model	Analytical Principle	Last Multipoint Calibration
E/N 54 Nicolet 6700 NO	FTIR	May 15, 2019
E/N 54 Nicolet 6700 NO2	FTIR	May 21, 2019

Triad Data Available Upon Request



Approved for Release

## CERTIFICATE OF ANALYSIS

### Grade of Product: EPA Protocol

Part Number:	E02NI99E15A0907	Reference Number:	54-401419735-1
Cylinder Number:	SG9161420BAL	Cylinder Volume:	144.4 CF
Laboratory:	124 - Chicago (SAP) - IL	Cylinder Pressure:	2015 PSIG
PGVP Number:	B12019	Valve Outlet:	660
Gas Code:	NO,NOX,BALN	Certification Date:	Feb 19, 2019

**Expiration Date: Feb 19, 2027**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a mole/mole basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

ANALYTICAL RESULTS					
Component	Requested Concentration	Actual Concentration	Protocol Method	Total Relative Uncertainty	Assay Dates
NOX	900.0 PPM	908.4 PPM	G1	+/- 0.7% NIST Traceable	02/12/2019, 02/19/2019
NITRIC OXIDE	900.0 PPM	907.6 PPM	G1	+/- 0.7% NIST Traceable	02/12/2019, 02/19/2019
NITROGEN	Balance			-	

CALIBRATION STANDARDS						
Type	Lot ID	Cylinder No	Concentration	Uncertainty	Expiration Date	
NTRM	08011705	KAL003776	970.9 PPM NITRIC OXIDE/NITROGEN	+/- 0.6%	Apr 16, 2024	
PRM	12367	APEX1099237	10.0 PPM NITROGEN DIOXIDE/AIR	+/- 1.5%	Jun 02, 2017	
GMIS	1114201605	CC506716	4.995 PPM NITROGEN DIOXIDE/NITROGEN	+/- 2.0%	Nov 14, 2019	

The SRM, PRM or RGM noted above is only in reference to the GMIS used in the assay and not part of the analysis.

ANALYTICAL EQUIPMENT		
Instrument/Make/Model	Analytical Principle	Last Multipoint Calibration
Nicolet 6700 AHR0801332	FTIR	Jan 28, 2019
Nicolet 6700 AHR0801332	FTIR	Jan 28, 2019

Triad Data Available Upon Request



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Signature on file

# CERTIFICATE OF ANALYSIS

## Grade of Product: EPA Protocol

Part Number:	E02NI99E15A0919	Reference Number:	54-401913314-1A
Cylinder Number:	CC416694	Cylinder Volume:	144.4 CF
Laboratory:	124 - Chicago (SAP) - IL	Cylinder Pressure:	2015 PSIG
PGVP Number:	B12020	Valve Outlet:	660
Gas Code:	NO,NOX,BALN	Certification Date:	Oct 08, 2020

**Expiration Date: Oct 08, 2028**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a mole/mole basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

ANALYTICAL RESULTS					
Component	Requested Concentration	Actual Concentration	Protocol Method	Total Relative Uncertainty	Assay Dates
NOX	500.0 PPM	509.9 PPM	G1	+/- 0.7% NIST Traceable	10/01/2020, 10/08/2020
NITRIC OXIDE	500.0 PPM	509.9 PPM	G1	+/- 0.7% NIST Traceable	10/01/2020, 10/08/2020
NITROGEN	Balance				

CALIBRATION STANDARDS					
Type	Lot ID	Cylinder No	Concentration	Uncertainty	Expiration Date
NTRM	15010122	KAL003982	494.6 PPM NITRIC OXIDE/NITROGEN	+/- 0.5%	Sep 01, 2021
PRM	12386	D685025	9.91 PPM NITROGEN DIOXIDE/AIR	+/- 2.0%	Feb 20, 2020
GMIS	401438583103	EB0120479	3.882 PPM NITROGEN DIOXIDE/NITROGEN	+/- 2.1%	Feb 18, 2023

The SRM, PRM or RGM noted above is only in reference to the GMIS used in the assay and not part of the analysis.

ANALYTICAL EQUIPMENT		
Instrument/Make/Model	Analytical Principle	Last Multipoint Calibration
Nicolet 6700 AHR0801332	FTIR	Sep 10, 2020
Nicolet 6700 AHR0801332	FTIR	Sep 10, 2020

Triad Data Available Upon Request



Signature on file



## Appendix C.3 Accreditation Information/Certifications



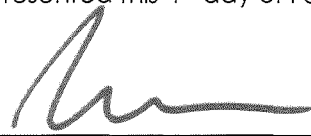
# *Accredited Air Emission Testing Body*

A2LA has accredited

## **MONTROSE AIR QUALITY SERVICES**

In recognition of the successful completion of the joint A2LA and Stack Testing Accreditation Council (STAC) evaluation process, this laboratory is accredited to perform testing activities in compliance with ASTM D7036:2004 - Standard Practice for Competence of Air Emission Testing Bodies.

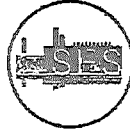
Presented this 4<sup>th</sup> day of February 2022.



Vice President, Accreditation Services  
For the Accreditation Council  
Certificate Number 3925.01  
Valid to February 29, 2024

*This accreditation program is not included under the A2LA ILAC Mutual Recognition Arrangement.*

# SOURCE EVALUATION SOCIETY



## Qualified Source Testing Individual

LET IT BE KNOWN THAT

**MICHAEL D. HESS**

HAS SUCCESSFULLY PASSED A COMPREHENSIVE EXAMINATION AND SATISFIED  
EXPERIENCE REQUIREMENTS IN ACCORDANCE WITH THE GUIDELINES  
ISSUED BY THE SES QUALIFIED SOURCE TEST INDIVIDUAL REVIEW BOARD FOR

***GASEOUS POLLUTANTS INSTRUMENTAL SAMPLING METHODS***

ISSUED THIS 11<sup>TH</sup> DAY OF AUGUST 2017 AND EFFECTIVE UNTIL AUGUST 10<sup>TH</sup>, 2022

Peter R. Westlin, QSTI/QSTO Review Board

Peter S. Pakalnins, QSTI/QSTO Review Board

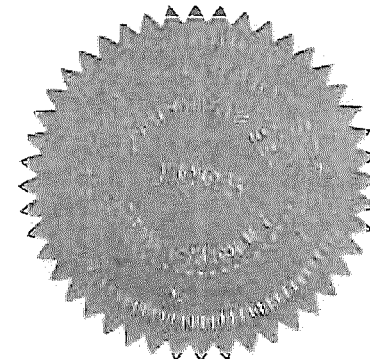
Theresa Lowe, QSTI/QSTO Review Board

J. Wade Bice, QSTI/QSTO Review Board

Karen D. Kajlya-Mills, QSTI/QSTO Review Board

Bruce Randell QSTI/QSTO Review Board

CERTIFICATE  
NO.  
2012-632



# SOURCE EVALUATION SOCIETY



## Qualified Source Testing Observer

LET IT BE KNOWN THAT

**HENRY M. TAYLOR**

HAS SUCCESSFULLY PASSED A COMPREHENSIVE EXAMINATION AND SATISFIED EXPERIENCE REQUIREMENTS IN ACCORDANCE WITH THE GUIDELINES ISSUED BY THE SES QUALIFIED SOURCE TEST INDIVIDUAL REVIEW BOARD FOR

**MANUAL GAS VOLUME MEASUREMENTS AND ISOKINETIC PARTICULATE SAMPLING METHODS**

ISSUED THIS 7<sup>TH</sup> DAY OF JANUARY 2020 AND EFFECTIVE UNTIL JANUARY 6<sup>TH</sup>, 2025

Peter R. Westlin, QSTI/QSTO Review Board

Peter S. Pakalnis, QSTI/QSTO Review Board

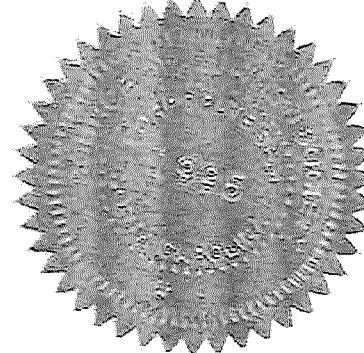
Tina Sanderson, QSTI/QSTO Review Board

J. Wade Blce, QSTI/QSTO Review Board

Karen D. Kajlya-Mills, QSTI/QSTO Review Board

Bruce Randall QSTI/QSTO Review Board

CERTIFICATE  
NO.  
2015-872



# SOURCE EVALUATION SOCIETY



## Qualified Source Testing Observer

LET IT BE KNOWN THAT

**HENRY M. TAYLOR**

HAS SUCCESSFULLY PASSED A COMPREHENSIVE EXAMINATION AND SATISFIED EXPERIENCE REQUIREMENTS IN ACCORDANCE WITH THE GUIDELINES ISSUED BY THE SES QUALIFIED SOURCE TEST INDIVIDUAL REVIEW BOARD FOR

**MANUAL GASEOUS POLLUTANTS SOURCE SAMPLING METHODS**

ISSUED THIS 28<sup>TH</sup> DAY OF JANUARY 2020 AND EFFECTIVE UNTIL JANUARY 27<sup>TH</sup>, 2025

Peter R. Westlin, QSTI/QSTO Review Board

Peter S. Pakalnis, QSTI/QSTO Review Board

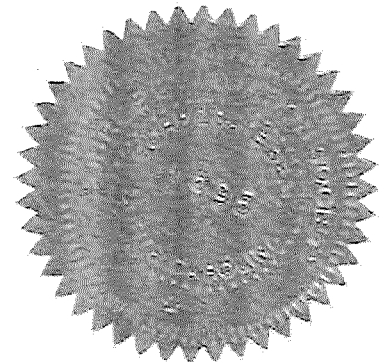
Tina Sanderson, QSTI/QSTO Review Board

J. Wade Bice, QSTI/QSTO Review Board

Karen D. Kajiya-Mills, QSTI/QSTO Review Board

Bruce Randall QSTI/QSTO Review Board

CERTIFICATE  
NO.  
2015-872



## **THIS IS THE LAST PAGE OF THIS DOCUMENT**

If you have any questions, please contact one of the following individuals by email or phone.

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