

**JAN 16 2018**
**Executive Summary**
**AIR QUALITY DIVISION**

GRANGER ELECTRIC AT THE BRENT RUN LANDFILL  
 CAT® G3520C LANDFILL GAS FUELED IC ENGINES  
 EMISSION TEST RESULTS

Granger Electric contracted Derenzo Environmental Services to conduct a performance demonstration for the determination of pollutant concentrations and emission rates from two (2) Caterpillar (CAT®) Model No. G3520C landfill gas-fired reciprocating internal combustion engines (RICE) and electricity generator sets (EUENGINE3 and EUENGINE6) operated at the Brent Run Landfill in Montrose, Michigan.

Michigan Department of Environmental Quality (MDEQ) Air Quality Division (AQD) Renewable Operating Permit No. MI-ROP-N5987-2015a requires that performance testing be performed on EUENGINE3 and EUENGINE6 within 180 days of startup and every 8,760 hours of operation (or every three years) in accordance with the provisions of 40 CFR Part 60 Subpart JJJJ (NSPS for spark RICE) for nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOC). The performance testing was conducted on November 30, 2017.

The following tables present the emissions results from the performance demonstration and engine operating data recorded during the test periods.

Emission Unit	NO <sub>x</sub> Emissions		CO Emissions		VOC Emissions	
	(lb/hr)	(g/bhp-hr)	(lb/hr)	(g/bhp-hr)	(lb/hr)	(g/bhp-hr)
EUENGINE3	1.89	0.39	14.7	3.0	0.76	0.16
<i>Permit Limit</i>	<i>4.94</i>	<i>1.0</i>	<i>16.3</i>	<i>3.3</i>	<i>--</i>	<i>1.0</i>
EUENGINE6	3.98	0.80	12.4	2.5	0.54	0.11
<i>Permit Limit</i>	<i>4.94</i>	<i>2.0</i>	<i>16.3</i>	<i>5.0</i>	<i>4.94</i>	<i>1.0</i>

Emission Unit	Generator Output (kW)	Engine Output (bhp)	LFG Fuel Use (scfm)	LFG CH <sub>4</sub> Content (%)	Exhaust Temp. (°F)
EUENGINE3	1,595	2,225	575	50.3	862
EUENGINE6	1,606	2,250	[NA]	50.3	805

The data presented above indicates that EUENGINE3 and EUENGINE6 were tested while the units operated within 10% of maximum capacity (the gensets are rated at 1,600 kW) and complies with the emission standards specified in 40 CFR 60.4233(e) and MDEQ-AQD ROP No. MI-ROP-N5987-2015a.

## AIR EMISSION TEST REPORT

Title                    AIR EMISSION TEST REPORT FOR THE  
VERIFICATION OF AIR POLLUTANT EMISSIONS  
FROM LANDFILL GAS FUELED INTERNAL  
COMBUSTION ENGINES

Report Date        January 8, 2018

Test Dates         November 30, 2017

<b>Facility Information</b>	
Name	Granger Electric at the Brent Run Landfill
Street Address	8247 W. Vienna Road
City, County	Montrose, Genesee
Facility SRN	N5987

<b>Facility Permit Information</b>	
ROP No.:	MI-ROP-N5987-2015a
Emission Units	EUENGINE3, EUENGINE6

<b>Testing Contractor</b>	
Company	Derenzo Environmental Services
Mailing Address	39395 Schoolcraft Road Livonia, MI 48150
Phone	(734) 464-3880
Project No.	1709006

AIR EMISSION TEST REPORT  
FOR THE  
VERIFICATION OF AIR POLLUTANT EMISSIONS  
FROM  
LANDFILL GAS FUELED INTERNAL COMBUSTION ENGINES  
GRANGER ELECTRIC AT THE BRENT RUN LANDFILL

**1.0 INTRODUCTION**

Granger Electric (Granger) operates Caterpillar (CAT®) landfill gas-fired reciprocating internal combustion engines (RICE) and electricity generator sets at the Brent Run Landfill in Montrose, Genesee County, Michigan. The landfill gas (LFG) fueled RICE-generator sets are identified as emission units EUENGINE1 through EUENGINE6 in Section 2 of Michigan Renewable Operating Permit (ROP) No. MI-ROP-N5987-2015a.

Engine Nos. 3 and 6 (EUENGINE3, EUENGINE6) are part of the emission group FG-RICENSPS. The conditions of MI-ROP-N5987-2015a for FG-RICENSPS specify that:

*Except as provided in 40 CFR 60.4243(b), the permittee shall conduct an initial performance test for EUENGINE3 and EUENGINE6 within one year after startup of the engine and every 8760 hours of operation (as determined through the use of a non-resettable hour meter) or three years, whichever occurs first, to demonstrate compliance with the emission limits in 40 CFR 60.4233(e), unless the engine(s) have been certified by the manufacturer ... If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4244*

The compliance testing was performed by Derenzo Environmental Services (DES). DES representatives Jason Logan and Kevin Anderson performed the field sampling and measurements November 30, 2017.

The exhaust gas sampling and analysis was performed using procedures specified in the Test Plan dated September 28, 2017 that was reviewed and approved by the MDEQ-AQD.

Questions regarding this emission test report should be directed to:

Jason Logan  
Project Manager  
Derenzo Environmental Services  
39395 Schoolcraft Road  
Livonia, MI 48150  
Ph: (734) 464-3880

Mr. Dan Zimmerman  
Director of North American Health & Safety,  
Compliance & Operations  
Energy Developments  
3259 Holt Road  
Mason, MI 48854  
Ph: (517) 896-9711

**Derenzo Environmental Services**

Granger Electric, Brent Run Landfill  
Air Emission Test Report

January 8, 2018  
Page 2

**Report Certification**

This test report was prepared by Derenzo Environmental Services based on field sampling data collected by DES. Facility process data were collected and provided by Granger employees or representatives. This test report has been reviewed by Granger representatives and approved for submittal to the MDEQ.

A Report Certification signed by the facility's Responsible Official accompanies this report.

I certify that the testing was conducted in accordance with the specified test methods and submitted test plan unless otherwise specified in this report. I believe the information provided in this report and its attachments are true, accurate, and complete.

Report Prepared By:

Reviewed By:

KEVIN ANDERSON



---

Kevin Anderson  
Environmental Consultant  
Derenzo Environmental Services

---

Robert L. Harvey, P.E.  
General Manager  
Derenzo Environmental Services

## 2.0 SUMMARY OF TEST RESULTS AND OPERATING CONDITIONS

### 2.1 Purpose and Objective of the Tests

The conditions of ROP No. MI-ROP-N5987-2015a and 40 CFR Part 60 Subpart JJJJ require Granger to test EUENGINE3 and EUENGINE6 for carbon monoxide (CO), nitrogen oxides (NOx) and volatile organic compound (VOC) emissions every 8,760 hours of operation.

### 2.2 Operating Conditions During the Compliance Tests

The testing was performed while the RICE generator sets were operated at maximum operating conditions (1,600 kW electricity output +/- 10%). Granger representatives provided the generator electricity output (kW) in 15-minute increments for each test period. The generator kW output ranged between 1,577 and 1,624 kW during the test periods.

Fuel flowrate (standard cubic feet per minute (scfm) or pounds per hour (lb/hr) and fuel methane content were also recorded by Granger representatives in 15-minute increments for each test period. The EUENGINE3 fuel consumption rate ranged between 571 and 581 scfm and the EUENGINE6 fuel consumption rate data was not available for the test. The treated LFG used to fuel the engines contained 50.1 to 50.4% methane. Fuel heat value was calculated using a lower heating value of 910 Btu/scf for methane.

In addition, the engine serial number and operating hours at the beginning of test No. 1 were recorded by the facility operators.

Appendix 2 provides operating records provided by Granger representatives for the test periods.

Engine output (bhp) cannot be measured directly and was calculated based on the recorded electricity output, the calculated CAT® Model G3520C generator efficiency (%), and the unit conversion factor for kW to horsepower (0.7457 kW/hp).

$$\text{EUENGINE3 engine output (bhp)} = \text{Electricity output (kW)} / (0.961) / (0.7457 \text{ kW/hp})$$

$$\text{EUENGINE6 engine output (bhp)} = \text{Electricity output (kW)} / (0.957) / (0.7457 \text{ kW/hp})$$

Table 2.1 presents a summary of the average engine operating conditions during the test periods.

RECEIVED

JAN 16 2018

Derenzo Environmental Services

Granger Electric, Brent Run Landfill  
Air Emission Test Report

January 8, 2018

Page 4

AIR QUALITY DIVISION

2.3 Summary of Air Pollutant Sampling Results

The gases exhausted from the LFG fueled RICE were each sampled for three (3) one-hour test periods during the compliance testing performed November 30, 2017.

Table 2.2 presents the average measured pollutant emission rates for EUENGINE3 and EUENGINE6 (average of the three test periods for each engine).

Test results for each one hour sampling period are presented in Section 6.0 of this report.

Table 2.1 Average engine operating conditions during the test periods

Engine Parameter	EUENGINE3	EUENGINE6
Generator output (kW)	1,595	1,606
Engine output (bhp)	2,225	2,285
Engine LFG fuel use (scfm)	575	*
LFG methane content (%)	50.3	50.3
LFG lower heating value (Btu/scf)	458	458
Exhaust temperature (°F)	862	805

\* An error occurred in recording Engine 6 fuel flow. See Section 6.2 for more information.

Table 2.2 Average measured emission rates (three-test average)

Emission Unit	NOx Emissions		CO Emissions		VOC Emissions	
	(lb/hr)	(g/bhp-hr)	(lb/hr)	(g/bhp-hr)	(lb/hr)	(g/bhp-hr)
EUENGINE3	1.89	0.39	14.7	3.0	0.77	0.16
<i>Permit Limit</i>	<i>4.94</i>	<i>1.0</i>	<i>16.3</i>	<i>3.3</i>	--	<i>1.0</i>
EUENGINE6	3.98	0.80	12.4	2.5	0.54	0.11
<i>Permit Limit</i>	<i>4.94</i>	<i>2.0</i>	<i>16.3</i>	<i>5.0</i>	<i>4.94</i>	<i>1.0</i>

### **3.0 SOURCE AND SAMPLING LOCATION DESCRIPTION**

#### **3.1 General Process Description**

Landfill gas (LFG) containing methane is generated in the Granger Brent Run Landfill from the anaerobic decomposition of disposed waste materials. The LFG is collected from both active and capped landfill cells using a system of wells (gas collection system). The collected LFG is transferred to the Granger LFG power station facility where it is treated and used as fuel for the RICE. Each RICE is connected to an electricity generator that produces electricity that is transferred to the local utility.

#### **3.2 Rated Capacities and Air Emission Controls**

The EUENGINE3 CAT® Model No. G3520C RICE has a rated output of 2,233 brake-horsepower (bhp) and the EUENGINE6 CAT® Model No. G3520C RICE has a rated output of 2,242 bhp. The connected generators each have a rated electricity output of 1,600 kilowatts (kW). The engines are designed to fire low-pressure, lean fuel mixtures (e.g., LFG) and are equipped with an air-to-fuel ratio controller that monitors engine performance parameters and automatically adjusts the air-to-fuel ratio and ignition timing to maintain efficient fuel combustion.

The RICE generator sets are not equipped with an add-on emission control device. Air pollutant emissions are minimized through the proper operation of the gas treatment system and efficient fuel combustion in the engines.

The fuel consumption rate is regulated automatically to maintain the heat input rate required to support engine operations and is dependent on the fuel heat value (methane content) of the treated LFG.

#### **3.3 Sampling Locations**

Each RICE exhaust gas is directed through a muffler and is released to the atmosphere through a dedicated vertical exhaust stack with a vertical release point.

The exhaust stack sampling ports for EUENGINE3 and EUENGINE6 are located in the exhaust stack with an inner diameter of 13.5 inches. Each stack is equipped with two (2) sample ports, opposed 90°, that provide a sampling location greater than 300 inches (22.2 duct diameters) upstream and greater than 114 inches (8.44 duct diameters) downstream from any flow disturbance and satisfies the USEPA Method 1 criteria for a representative sample location.

Individual traverse points were determined in accordance with USEPA Method 1.

Appendix 1 provides diagrams of the emission test sampling locations.

#### **4.0 SAMPLING AND ANALYTICAL PROCEDURES**

A test protocol for the air emission testing was reviewed and approved by the MDEQ. This section provides a summary of the sampling and analytical procedures that were used during the test periods.

##### **4.1 Summary of Sampling Methods**

USEPA Method 1	Exhaust gas velocity measurement locations were determined based on the physical stack arrangement and requirements in USEPA Method 1.
USEPA Method 2	Exhaust gas velocity pressure was determined using a Type-S Pitot tube connected to a red oil incline manometer; temperature was measured using a K-type thermocouple connected to the Pitot tube.
USEPA Method 3A	Exhaust gas O <sub>2</sub> and CO <sub>2</sub> content was determined using zirconia ion/paramagnetic and infrared instrumental analyzers, respectively.
USEPA Method 4	Exhaust gas moisture was determined based on the water weight gain in chilled impingers.
USEPA Method 7E	Exhaust gas NO <sub>x</sub> concentration was determined using chemiluminescence instrumental analyzer.
USEPA Method 10	Exhaust gas CO concentration was measured using an NDIR instrumental analyzer.
USEPA Method 25A / ALT-096	Exhaust gas VOC (as NMHC) concentration was determined using a flame ionization analyzer equipped with methane separation column.

##### **4.2 Exhaust Gas Velocity Determination (USEPA Method 2)**

The exhaust stack gas velocities and volumetric flow rates for each RICE were determined using USEPA Method 2 prior to each test. An S-type Pitot tube connected to a red-oil manometer was used to determine velocity pressure at each traverse point across the stack cross section. Gas temperature was measured using a K-type thermocouple mounted to the Pitot tube.

Appendix 3 provides exhaust gas flowrate calculations and field data sheets.

##### **4.3 Exhaust Gas Molecular Weight Determination (USEPA Method 3A)**

CO<sub>2</sub> and O<sub>2</sub> content in each RICE exhaust gas stream were measured continuously throughout each test period in accordance with USEPA Method 3A. The CO<sub>2</sub> content of the exhaust was



## **Derenzo Environmental Services**

Granger Electric, Brent Run Landfill  
Air Emission Test Report

January 8, 2018  
Page 7

monitored using a Servomex 1440D single beam single wavelength (SBSW) infrared gas analyzer. The O<sub>2</sub> content of the exhaust was monitored using a Servomex 1440D gas analyzer that uses a paramagnetic sensor.

During each sampling period, a continuous sample of the RICE exhaust gas stream was extracted from the stack using a stainless steel probe connected to a Teflon® heated sample line. The sampled gas was conditioned by removing moisture prior to being introduced to the analyzers; therefore, measurement of O<sub>2</sub> and CO<sub>2</sub> concentrations correspond to standard dry gas conditions. Instrument response data were recorded using an ESC Model 8816 data acquisition system that monitored the analog output of the instrumental analyzers continuously and logged data as one-minute averages.

Prior to, and at the conclusion of each test, the instruments were calibrated using upscale calibration and zero gas to determine analyzer calibration error and system bias (described in Section 5.0 of this document). Sampling times were recorded on field data sheets.

Appendix 4 provides O<sub>2</sub> and CO<sub>2</sub> calculation sheets. Raw instrument response data are provided in Appendix 5.

### **4.4 Exhaust Gas Moisture Content (USEPA Method 4)**

Moisture content of each RICE exhaust gas was determined in accordance with USEPA Method 4 using a chilled impinger sampling train. The moisture sampling was performed concurrently with the instrumental analyzer sampling. During each sampling period a gas sample was extracted at a constant rate from the source where moisture was removed from the sampled gas stream using impingers that were submersed in an ice bath. At the conclusion of each sampling period, the moisture gain in the impingers was determined gravimetrically by weighing each impinger to determine net weight gain.

### **4.5 NO<sub>x</sub> and CO Concentration Measurements (USEPA Methods 7E and 10)**

NO<sub>x</sub> and CO pollutant concentrations in each RICE exhaust gas stream were determined using a Thermo Environmental Instruments, Inc. (TEI) Model 42c High Level chemiluminescence NO<sub>x</sub> analyzer and a infrared CO analyzer.

Throughout each test period, a continuous sample of the engine exhaust gas was extracted from the stack using the Teflon® heated sample line and gas conditioning system and delivered to the instrumental analyzers. Instrument response for each analyzer was recorded on an ESC Model 8816 data acquisition system that logged data as one-minute averages. Prior to, and at the conclusion of each test, the instruments were calibrated using upscale calibration and zero gas to determine analyzer calibration error and system bias.

Appendix 4 provides CO and NO<sub>x</sub> calculation sheets. Raw instrument response data are provided in Appendix 5.

## **Derenzo Environmental Services**

Granger Electric, Brent Run Landfill  
Air Emission Test Report

January 8, 2018  
Page 8

### **4.6 Measurement of Volatile Organic Compounds (USEPA Method 25A/ALT-096)**

The VOC emission rate was determined by measuring the nonmethane hydrocarbon (NMHC) concentration in each RICE exhaust gas. NMHC pollutant concentration was determined using a TEI Model 55i Methane / Nonmethane hydrocarbon analyzer. The TEI 55i analyzer contains an internal gas chromatograph column that separates methane from non-methane components. The concentration of NMHC in the sampled gas stream, after separation from methane, is determined relative to a propane standard using a flame ionization detector in accordance with USEPA Method 25A.

The USEPA Office of Air Quality Planning and Standards (OAQPS) has issued several alternate test methods approving the use of the TEI 55-series analyzer as an effective instrument for measuring NMOC from gas-fueled reciprocating internal combustion engines (RICE) in that it uses USEPA Method 25A and 18 (ALT-066, ALT-078 and ALT-096).

Samples of the exhaust gas were delivered directly to the instrumental analyzer using the Teflon® heated sample line to prevent condensation. The sample to the NMHC analyzer was not conditioned to remove moisture. Therefore, VOC measurements correspond to standard conditions with no moisture correction (wet basis).

Prior to, and at the conclusion of each test, the instrument was calibrated using mid-range calibration (propane) and zero gas to determine analyzer calibration error and system bias (described in Section 5.0 of this document).

Appendix 4 provides VOC calculation sheets. Raw instrument response data for the NMHC analyzer is provided in Appendix 5.

## **5.0 QA/QC ACTIVITIES**

### **5.1 Flow Measurement**

Prior to arriving onsite, the instruments used during the source test to measure exhaust gas properties and velocity (barometer, pyrometer, and Pitot tube) were calibrated to specifications outlined in the sampling methods.

The Pitot tube and connective tubing were leak-checked prior to each traverse to verify the integrity of the measurement system.

The absence of significant cyclonic flow for the exhaust configuration was verified using an S-type Pitot tube and oil manometer. The Pitot tube was positioned at each velocity traverse point with the planes of the face openings of the Pitot tube perpendicular to the stack cross-sectional plane. The Pitot tube was then rotated to determine the null angle (rotational angle as measured from the perpendicular, or reference, position at which the differential pressure is equal to zero).

### **5.2 NO<sub>x</sub> Converter Efficiency Test**

The NO<sub>2</sub> – NO conversion efficiency of the Model 42c analyzer was verified prior to the testing program. A USEPA Protocol 1 certified concentration of NO<sub>2</sub> was injected directly into the analyzer, following the initial three-point calibration, to verify the analyzer's conversion efficiency. The analyzer's NO<sub>2</sub> – NO converter uses a catalyst at high temperatures to convert the NO<sub>2</sub> to NO for measurement. The conversion efficiency of the analyzer is deemed acceptable if the measured NO<sub>2</sub> concentration is greater than or equal to 90% of the expected value.

The NO<sub>2</sub> – NO conversion efficiency test satisfied the USEPA Method 7E criteria (measured NO<sub>2</sub> concentration was 99.5% of the expected value, i.e., greater than 90% of the expected value as required by Method 7E).

### **5.3 Gas Divider Certification (USEPA Method 205)**

A STEC Model SGD-710C 10-step gas divider was used to obtain appropriate calibration span gases. The ten-step STEC gas divider was NIST certified (within the last 12 months) with a primary flow standard in accordance with Method 205. When cut with an appropriate zero gas, the ten-step STEC gas divider delivered calibration gas values ranging from 0% to 100% (in 10% step increments) of the USEPA Protocol 1 calibration gas that was introduced into the system. The field evaluation procedures presented in Section 3.2 of Method 205 were followed prior to use of gas divider. The field evaluation yielded no errors greater than 2% of the triplicate measured average and no errors greater than 2% from the expected values.

#### **5.4 Instrumental Analyzer Interference Check**

The instrumental analyzers used to measure NO<sub>x</sub>, CO, O<sub>2</sub>, CO<sub>2</sub>, have had an interference response test performed prior to their use in the field, pursuant to the interference response test procedures specified in USEPA Method 7E. The appropriate interference test gases (i.e., gases that would be encountered in the exhaust gas stream) were introduced into each analyzer, separately and as a mixture with the analyte that each analyzer is designed to measure. All of analyzers exhibited a composite deviation of less than 2.5% of the span for all measured interferent gases. No major analytical components of the analyzers have been replaced since performing the original interference tests.

#### **5.5 Instrument Calibration and System Bias Checks**

At the beginning of each day of the testing program, initial three-point instrument calibrations were performed for the NO<sub>x</sub>, CO, CO<sub>2</sub>, O<sub>2</sub>, analyzers by injecting calibration gas directly into the inlet sample port for each instrument. System bias checks were performed prior to and at the conclusion of each sampling period by introducing the upscale calibration gas and zero gas into the sampling system (at the base of the stainless steel sampling probe prior to the particulate filter and Teflon® heated sample line) and determining the instrument response against the initial instrument calibration readings.

At the beginning of each test day, appropriate high-range, mid-range, and low-range span gases followed by a zero gas were introduced to the NMHC analyzer, in series at a tee connection, which is installed between the sample probe and the particulate filter, through a poppet check valve. After each one hour test period, mid-range and zero gases were re-introduced in series at the tee connection in the sampling system to check against the method's performance specifications for calibration drift and zero drift error.

The instruments were calibrated with USEPA Protocol 1 certified concentrations of CO<sub>2</sub>, O<sub>2</sub>, NO<sub>x</sub>, and CO in nitrogen or air and zeroed using hydrocarbon-free nitrogen or air. The NMHC (VOC) instrument was calibrated with USEPA Protocol 1 certified concentrations of propane in air and zeroed using hydrocarbon-free air. A STEC Model SGD-710C ten-step gas divider was used to obtain intermediate calibration gas concentrations as needed.

#### **5.6 Determination of Exhaust Gas Stratification**

A stratification test was performed for each RICE exhaust stack. The stainless steel sample probe was positioned at sample points correlating to 16.7, 50.0 (centroid) and 83.3% of the stack diameter. Pollutant concentration data were recorded at each sample point for a minimum of twice the maximum system response time.

The recorded concentration data for the RICE exhaust stack indicated that the measured NO<sub>x</sub> concentrations did not vary by more than 5% of the mean across the stack diameter. Therefore, the RICE exhaust gas was considered to be unstratified and the compliance test sampling was performed at a single sampling location within each RICE exhaust stack.

## **Derenzo Environmental Services**

Granger Electric, Brent Run Landfill  
Air Emission Test Report

January 8, 2018  
Page 11

### **5.7 Meter Box Calibrations**

The dry gas metering console, which was used for exhaust gas moisture content sampling, was calibrated prior to and after the testing program. This calibration uses the critical orifice calibration technique presented in USEPA Method 5. The metering console calibration exhibited no data outside the acceptable ranges presented in USEPA Method 5.

The digital pyrometer in the Nutech metering consoles were calibrated using a NIST traceable Omega<sup>®</sup> Model CL 23A temperature calibrator.

Appendix 6 presents test equipment quality assurance data (NO<sub>2</sub> – NO conversion efficiency test data, instrument calibration and system bias check records, calibration gas and gas divider certifications, interference test results, meter box calibration records, Pitot tube calibration records).

## **6.0 RESULTS**

### **6.1 Test Results and Allowable Emission Limits**

Engine operating data and air pollutant emission measurement results for each one hour test period are presented in Tables 6.1 and 6.2.

The measured air pollutant emission rates for Engine No. 3 are less than the allowable limits specified in ROP No. MI-ROP-N5987-2015a for FG-RICENSPS:

- 4.94 lb/hr and 1.0 g/bhp-hr for NO<sub>x</sub>;
- 16.3 lb/hr and 3.3 g/bhp-hr for CO; and
- 1.0 g/bhp-hr for VOC.

The measured air pollutant emission rates for Engine No. 6 are less than the allowable limits specified in ROP No. MI-ROP-N5987-2015a for Emission Unit EUENGINE6:

- 4.94 lb/hr and 2.0 g/bhp-hr for NO<sub>x</sub>;
- 16.3 lb/hr and 5.0 g/bhp-hr for CO;
- 4.94 lb/hr and 1.0 g/bhp-hr for VOC;

### **6.2 Variations from Normal Sampling Procedures or Operating Conditions**

The testing for all pollutants was performed in accordance with USEPA methods and the approved test protocol. Each RICE generator set was operated within 10% of maximum output (1,600 kW generator output) during the engine test periods.

There was a data recording error relative to the fuel flowrate data for Engine 6. Instead of recording the fuel mass flowrate, the engine operator mistakenly recorded the intake combustion air mass flowrate. All other operating data for Engine 6 were recorded correctly. Since Engine 6 was operating near 1,600 kW and using the same gas source as Engine 3, it can be assumed that the fuel consumption rate for Engines 6 was similar to that of Engine 3 (i.e., approximately 570 scfm).

**Derenzo Environmental Services**

Granger Electric, Brent Run Landfill  
Air Emission Test Report

January 8, 2018  
Page 13

Table 6.1 Measured exhaust gas conditions and NO<sub>x</sub>, CO, and VOC air pollutant emission rates  
Granger Brent Run Facility Engine No. 3 (EUENGINE3)

Test No.	1	2	3	
Test date	11/30/17	11/30/17	11/30/17	Three Test
Test period (24-hr clock)	7:41 – 8:41	9:00 – 10:00	10:16-11:16	Average
Fuel flowrate (scfm)	574	576	575	575
Generator output (kW)	1,603	1,593	1,588	1,595
Engine output (bhp)	2,237	2,223	2,215	2,225
LFG methane content (%)	50.4	50.3	50.3	50.3
LFG heat content (Btu/scf)	459	458	458	458
<u>Exhaust Gas Composition</u>				
CO <sub>2</sub> content (% vol)	11.2	11.2	11.2	11.2
O <sub>2</sub> content (% vol)	8.91	8.82	8.89	8.87
Moisture (% vol)	11.8	11.4	11.4	11.5
Exhaust gas temperature (°F)	861	863	862	862
Exhaust gas flowrate (dscfm)	4,401	4,476	4,424	4,433
Exhaust gas flowrate (scfm)	4,991	5,050	4,993	5,011
<u>Nitrogen Oxides</u>				
NO <sub>x</sub> conc. (ppmvd)	60.0	59.8	58.8	59.5
NO <sub>x</sub> emissions (lb/hr)	1.89	1.92	1.86	1.89
Permitted emissions (lb/hr)	-	-	-	4.94
NO <sub>x</sub> emissions (g/bhp*hr)	0.38	0.39	0.38	0.39
Permitted emissions (g/bhp*hr)	-	-	-	1.0
<u>Carbon Monoxide</u>				
CO conc. (ppmvd)	755	765	759	760
CO emissions (lb/hr)	14.5	15.0	14.7	14.7
Permitted emissions (lb/hr)	-	-	-	16.3
CO emissions (g/bhp*hr)	2.94	3.05	3.00	3.00
Permitted emissions (g/bhp*hr)	-	-	-	3.3
<u>Volatile Organic Compounds</u>				
VOC conc. (ppmv as C <sub>3</sub> ) <sup>1</sup>	21.0	22.8	22.9	22.2
VOC emissions (lb/hr)	0.72	0.79	0.78	0.76
VOC emissions (g/bhp*hr)	0.15	0.16	0.16	0.16
Permitted emissions (g/bhp*hr)	-	-	-	1.0

1. VOC measured as nonmethane hydrocarbons.

**Derenzo Environmental Services**

Granger Electric, Brent Run Landfill  
Air Emission Test Report

January 8, 2018  
Page 14

Table 6.2 Measured exhaust gas conditions and NO<sub>x</sub>, CO, VOC, and air pollutant emission rates  
Granger Brent Run Facility Engine No. 6 (EUENGINE6)

Test No.	1	2	3	Three Test Average
Test date	11/30/17	11/30/17	11/30/17	
Test period (24-hr clock)	11:35-12:35	12:55-13:55	14:11-15:11	
Combustion air flowrate <sup>1</sup> (lb/hr)	21,007	21,053	21,053	21,038
Generator output (kW)	1,595	1,606	1,617	1,606
Engine output (bhp)	2,235	2,250	2,265	2,250
LFG methane content (%)	50.4	50.3	50.2	50.3
LFG heat content (Btu/scf)	459	458	457	458
<u>Exhaust Gas Composition</u>				
CO <sub>2</sub> content (% vol)	11.3	11.2	11.3	11.3
O <sub>2</sub> content (% vol)	8.82	8.86	8.79	8.82
Moisture (% vol)	10.7	11.6	11.1	11.1
Exhaust gas temperature (°F)	805	803	807	805
Exhaust gas flowrate (dscfm)	4,300	4,261	4,303	4,288
Exhaust gas flowrate (scfm)	4,813	4,818	4,839	4,823
<u>Nitrogen Oxides</u>				
NO <sub>x</sub> conc. (ppmvd)	128	132	129	129
NO <sub>x</sub> emissions (lb/hr)	3.94	4.02	3.97	3.98
Permitted emissions (lb/hr)	-	-	-	4.94
NO <sub>x</sub> emissions (g/bhp*hr)	0.80	0.81	0.80	0.80
Permitted emissions (g/bhp*hr)	-	-	-	2.0
<u>Carbon Monoxide</u>				
CO conc. (ppmvd)	651	654	654	653
CO emissions (lb/hr)	12.4	12.3	12.4	12.4
Permitted emissions (lb/hr)	-	-	-	16.3
CO emissions (g/bhp*hr)	2.52	2.49	2.49	2.50
Permitted emissions (g/bhp*hr)	-	-	-	5.0
<u>Volatile Organic Compounds</u>				
VOC conc. (ppmv as C <sub>3</sub> ) <sup>2</sup>	16.1	16.8	16.3	16.4
VOC emissions (lb/hr)	0.53	0.56	0.54	0.54
Permitted emissions (lb/hr)	-	-	-	4.94
VOC emissions (g/bhp*hr)	0.11	0.11	0.11	0.11
Permitted emissions (g/bhp*hr)	-	-	-	1.0

1. Combustion air flowrate was recorded instead of LFG use.
2. VOC measured as nonmethane hydrocarbons.