FINAL REPORT

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COMPLIANCE TESTING REPORT: EUCHP1 AND EUCHP3 EMISSIONS REPORT

RWDI #2407736

November 10, 2024

SUBMITTED TO

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EXECUTIVE SUMMARY

RWDI USA LLC (RWDI) was retained by the City of Grand Rapids Environmental Support Department (Grand Rapids ESD) to complete the emission sampling program at the Grand Rapids Water Resource Recovery Facility (WRRF) located at 1300 Market Avenue SW, Grand Rapids, Michigan 49503. WRRF operates two (2) RICE engines, EUCHP1 and EUCHP3. Testing consisted of emissions for nitrogen oxides (NO_x), carbon monoxide (CO), non-methane organic compounds (NMOC), and formaldehyde (CH_2O) from each engine. The testing was required by Michigan Department of Environment, Great Lakes, and Energy (EGLE) Permit-to-install (PTI) 37-19B.

Compliance testing took place on September 12, 2024.

Executive Table i: Results Summary – EUCHP1

Source	Analyte	Units	Test 1	Limit
CHP1	NO_x	$ppmv_d$ @ 15% O_2	41.1	82
		g/hp-hr	0.44	0.55
	CO	$ppmv_d$ @ 15% O_2	3.69	270
		g/hp-hr	0.03	0.44
	NMOC	$ppmv_d$ @ 15% O_2	1.78	60
		g/hp-hr	0.01	0.105
	HCOH	lb/hr	0.061	0.056

Upon testing EUCHP1, HCOH was determined to not meet the lb/hr emission limit as outlined in the Permit to Install. After conversations with the facility and EGLE, it was decided to not continue with the testing on EUCHP1 and to present the data to EGLE collected during the one (1) test completed. The collected data is included in the report under **Appendix B**. The unit could not operate for the required time to complete a flow measurement. As a result, RWDI used the average flow measurements from the testing conducted on the unit in 2023 to calculate lb/hr emission rate. This was further discussed with Mr. Jeremy Howe as an acceptable method to estimate emission rate for the one (1) test completed.

Executive Table ii: Results Summary – EUCHP3

Source	Analyte	Units	Average	Limit
CHP3	NO_x	$ppmv_d$ @ 15% O_2	44.4	82
		g/hp-hr	0.52	0.55
	CO	$ppmv_d$ @ 15% O_2	2.99	270
		g/hp-hr	0.02	0.44
	NMOC	$ppmv_d$ @ 15% O_2	0.46	60
		g/hp-hr	0.005	0.105
	HCOH	lb/hr	0.048	0.056

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1 INTRODUCTION

RWDI USA LLC (RWDI) has been retained by the City of Grand Rapids Environmental Support Department (Grand Rapids ESD) to complete the emission sampling program at the Grand Rapids Water Resource Recovery Facility (WRRF) located at 1300 Market Avenue SW, Grand Rapids, Michigan 49503. WRRF operates two (2) RICE engines, EUCHP1 and EUCHP3. Testing consisted of emissions for nitrogen oxides (NO_x), carbon monoxide (CO), non-methane organic compounds (NMOC), and formaldehyde (CH_2O) from each engine. The testing was required by Michigan Department of Environment, Great Lakes, and Energy (EGLE) Permit-to-install (PTI) 37-19B.

1.1 Location and Date of Testing

The testing program was completed on September 12, 2024, at the Grand Rapids WRRF facility located at 1300 Market Avenue SW, Grand Rapids, Michigan 49503.

1.2 Purpose of the Testing

The purpose of testing was to show compliance with Michigan Department of Environment, Great Lakes, and Energy PTI 37-19b.

1.3 Description of the Source

Grand Rapids WRRF operates two (2) RICE engines with a nominal rating of 1.411 MW, used for electricity generation and heat for a heat loop for the digester tanks and incidental building heat.

1.4 Personnel Involved in Testing

Table 1.4.1: List of Testing Personnel

Russel Lewis Supervisor RFLewis@grcity.us	**Grand Rapids Water Resource Recovery Facility** 1300 Market Ave SW Grand Rapids, Michigan	(616) 456-3639
Clayton DeRonne Environmental Quality Analyst DeRonneC@michigan.gov	**State of Michigan** Department of Environment, Great Lakes, and Energy	(517) 855-1357
Ben Durham Senior Field Technician Ben.Durham@rwdi.com	**RWDI USA LLC** 24445 Forterra Drive Warren, Michigan	(734) 474-1731
Brad Bergeron Technical Director Brad.Bergeron@rwdi.com		(248) 234-3885

2 SUMMARY OF RESULTS

2.1 Operating Data

Operational data collected during the testing included the following (found in **Appendix A**):

- Engine Power Output (kW)
- Engine Operating Horsepower (bHp)
- Fuel flow
- Catalyst Temperature
- Engine Speed (rpm)

Note: catalyst temperature for CHP1 was provided by Grand Rapids WRRF. For CHP3, the catalyst temperature data is typically provided by Grand Rapid WRRF's contractor. Due to a communication error, the data can not be retrieved at the time of this report submission. RWDI did record catalyst temperature twice during the testing for CHP3 and is provided in **Appendix A**.

2.2 Applicable Permit Number

The purpose of testing was to show compliance with Michigan Department of Environment, Great Lakes, and Energy PTI 37-19b.

3 SOURCE DESCRIPTION

3.1 Description of Process and Emission Control Equipment

Refer to Section 1.3 for a description of the process. Both engines are equipped with an oxidation catalyst for the control of CO, VOC, and HCOH.

3.2 Process Flow Sheet or Diagram

A process schematic can be provided upon request.

3.3 Type and Quantity of Raw and Finished Materials

The Engines use natural gas to produce power.

3.4 Normal Rated Capacity of Process

Both engines have a nominal rating of 1.411 MW (12.07 MMBTU/hr).

3.5 Process Instrumentation Monitored During the Testing

Engine parameters included the following:

- Engine Power Output (kW)
- Engine Operating Horsepower (BHP)
- Fuel flow (ft^3/hr)
- Catalyst Temperature (°F)
- Engine Speed (rpm)

4 POLLUTANTS TO BE MEASURED

Testing consisted of emissions for nitrogen oxides (NO_x), carbon monoxide (CO), non-methane organic compounds (NMOC), and formaldehyde (HCOH).

5 SAMPLING AND ANALYSIS PROCEDURES

The following section provides brief descriptions of the proposed sampling methods and discusses any proposed modifications to the reference test methods.

5.1 Stack Velocity, Temperature, and Volumetric Flow Rate Determination

The exhaust velocities and flow rates were determined following the USEPA Method 2, "Determination of Stack Gas Velocity and Flow Rate (Type S Pitot Tube)" from the outlet only. Velocity measurements were taken with a pre-calibrated S-Type pitot tube and incline manometer. Volumetric flow rates were determined following the equal area method as outlined in US EPA Method 2. Temperature measurements were made simultaneously with the velocity measurements and were conducted using a chromel-alumel type "k" thermocouple in conjunction with a digital temperature indicator.

The dry molecular weight of the stack gas was determined following calculations outlined in US EPA Method 3A "Determination of Molecular Weight of Dry Stack Gas" for O_2. USEPA Method 320 was used for CO_2 content.

Stack moisture content was determined in accordance with USEPA Method 320.

5.2 NO_x, CO, VOC and HCOH by USEPA Method 320

Emissions testing was performed at the outlet of each engine. Pollutant concentrations was determined utilizing RWDI's continuous emissions monitoring system (CEM) which consists of the FTIR and oxygen analyzer (measuring on wet basis).

Stack gas concentrations for NO_x, CO, H_2O, HCOH, CO_2 and O_2 was measured using EPA Reference Methods 320 and 3A.

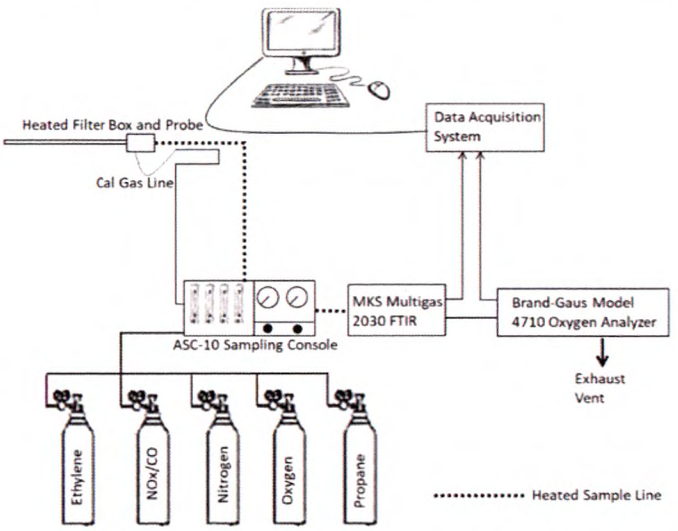
Oxygen measurements were taken continuously following USEPA Method 3A. Stratification checks using O_2 as the surrogate for all pollutants, was completed on the exhaust of each engine at three points (16.7%, 50% and 83.3% of inner diameter) on a line passing through the centroidal area, as per the alternative approach in EPA Method 7E Section 8.1.2. The stack was determined to be not stratified.

Regular performance checks on the CEMS were carried out by zero and span calibration checks on the oxygen analyzer and necessary QA procedures on the FTIR using USEPA Protocol calibration gases. These checks will verify the ongoing precision of the FTIR with time by introducing pollutant-free (zero) air followed by known calibration gas (span) into the FTIR. The response of the monitor to pollutant-free air and the corresponding sensitivity to the span gases was reviewed frequently as an ongoing indication of analyzer performance.

Monitoring was conducted by drawing a sample stream of flue gases through a stainless-steel probe attached to a heated filter and a heated sample line that is attached to the MAX Analytical ASC-10ST sampling console. Lengths of unheated sample line was kept to a minimum and insulated. The ASC-10ST sampling console delivers a continuous sample to the MKS MultiGas 2030 FTIR and oxygen analyzer for analysis. The heated filter and line were maintained at approximately 191°C (375°F) and the MKS MultiGas 2030 FTIR and ASC-10ST gas components were kept at 191°C (375°F). The end of the probe was connected to a heated Teflon sample line, which will deliver the sample gases from the stack to the FTIR system. The heated sample line was designed to maintain the gas

temperature at approximately 375°F to prevent condensation of stack gas moisture within the line and condition air to the same temperature as the FTIR. A schematic of the sampling system setup is depicted in **Figure 5.2a.**

Figure 5.2a: MKS 2030 Multigas FTIR/ASC-10ST/Model 4710 Oxygen Analyzer Sampling System Schematic



The ASC-10ST was used to deliver calibration gases (Calibration Transfer Standard (CTS), QA Spike and Nitrogen) to the FTIR in direct (to analyzer) and system (to probe) modes.

A laptop computer was utilized for operating the MKS MultiGas 2030 FTIR and MAX Analytical ASC-10ST sampling console and logging the multi-gas FTIR data. Data was logged as one-minute averages for the actual test period (FTIR PRN files and Spectra). All concentration data was determined using the MKS 2030 MultiGas FTIR software. A typical MKS 2030 FTIR and ASC-10 ST configuration is depicted in **Figure 5.2b.**

For oxygen measurement only, prior to testing, a 3-point analyzer calibration error check was conducted using USEPA protocol gases. The calibration error check was performed by introducing zero, mid and high-level calibration gases directly into the analyzer. The calibration error check was performed to confirm that the analyzer response is within ±2% of the certified calibration gas introduced. Prior to each test run, a system-bias test was performed where known concentrations of calibration gases were introduced at the probe tip to measure if the analyzers response was within ±5% of the introduced calibration gas concentrations. At the conclusion of each test run a system-bias check was performed to evaluate the percent drift from pre and post-test system bias checks. The system bias checks were used to confirm that the analyzer did not drift greater than ±3% throughout a test run. The analyzer will measure the respective gas concentrations on a dry volumetric basis

The probe tip was equipped with a heated filter for particulate removal. The end of the probe was connected to a heated Teflon sample line, which will deliver the sample gases from the stack to the FTIR/4710 Oxygen analyzer system. The heated sample line was designed to maintain the gas temperature at approximately 375°F to prevent condensation of stack gas moisture within the line.

Figure 5.2b: Typical MKS 2030 Multigas FTIR and ASC-10ST Configuration

6 NUMBER AND LENGTH OF SAMPLING RUNS

Testing consisted of three (3) 1-hour tests on EUCHP3 and one test on EUCHP3.

7 STACK INFORMATION

EUCHP1 and EUCHP3 had identical stack measurements.

Table 7.1: Summary of the Stack Characteristics

Source	Diameter	Approximate Duct Diameters from Flow Disturbance	Number of Ports	Points per Traverse	Total Points per Test
EUCHP1 EUCHP3	15"	2.13 downstream and 2.67 upstream	2	8	16 Flow

8 FLUE GAS CONDITIONS

Table 8.1: Flue Gas Conditions

Parameter	Flue Gas Conditions		
	Stack Temperature (°F)	Flow Rate (dscfm)	Moisture (%)
EUCHP3	738.1	4,034	10.75

9 TEST RESULTS AND DISCUSSION

9.1 Detailed Results

The following tables give a summary of the results. Detailed results for all analytes are provided in **Appendices B and C**.

Table 9.1.1: Results Summary – EUCHP1

Source	Analyte	Units	Test 1	Limit
CHP1	NO_x	$ppmv_d$ @ 15% O_2	41.1	82
		g/hp-hr	0.44	0.55
	CO	$ppmv_d$ @ 15% O_2	3.69	270
		g/hp-hr	0.03	0.44
	NMOC	$ppmv_d$ @ 15% O_2	1.78	60
		g/hp-hr	0.01	0.105
	HCOH	lb/hr	0.061	0.056

Table 9.1.2: Results Summary – EUCHP3

Source	Analyte	Units	Average	Limit
CHP3	NO_x	$ppmv_d$ @ 15% O_2	44.4	82
		g/hp-hr	0.52	0.55
	CO	$ppmv_d$ @ 15% O_2	2.99	270
		g/hp-hr	0.02	0.44
	NMOC	$ppmv_d$ @ 15% O_2	0.46	60
		g/hp-hr	0.005	0.105
	HCOH	lb/hr	0.048	0.056

9.2 Discussion of Results

The detailed results of individual tests can be found in **Appendices B and C**.

9.3 Variations in Testing Procedures

Testing was completed as detailed in the test plan submitted to EGLE.

9.4 Modifications to Testing Program

Upon testing EUCHP1, HCOH was exceeding its lb/hr emission limit. After conversations with the facility and EGLE, it was decided to not continue with the testing on EUCHP1 and to present the data to EGLE collected during the one (1) test. The collected data is included in the report under **Appendix B**. The unit could not operate for the required time to complete a flow measurement. As a result, RWDI used the average flow measurements from the testing conducted on the unit in 2023 to calculate lb/hr emission rate. This was further discussed with Mr. Jeremy Howe as an acceptable method to estimate emission rate for the one (1) test completed.

9.5 Process Upset Conditions During Testing

Refer to Section 9.4 for EUCHP1. EUCHP3 did not experience and upsets in the process.

9.6 Maintenance Performed in Last Three Months

Only routine maintenance was performed on the units in the previous three months.

9.7 Re-Test

This was not a retest.

9.8 Audit Samples

This test did not require any audit samples.

9.9 Process Data

Process data can be found in **Appendix A**.

9.10 Field Notes

Field notes can be found in **Appendix D**.

9.11 Calibration Data

Calibration data can be found in **Appendix E**.

9.12 Example Calculations

Example calculations can be found in **Appendix F**.

9.13 Source Testing Plan and EGLE Correspondence

Copy of the correspondence received from the Source Testing Plan from EGLE and the Source Testing Plan submitted can be found in **Appendix G**.

9.14 Laboratory Data

There was no laboratory data affiliated with this testing.

TABLES

Table 1: Summary of Emissions - EUCHP1

Grand Rapids Water Resources Recovery Facility

Facility: Grand Rapids Water Resources Recovery Facility
City: Grand Rapids, Michigan
Source: EUCHP1
Date: 9/12/2024

	Symbol	Units	Test 1	Corrected to 15% O_2	Limits
Nitrogen Oxides Concentration	NO_x	ppmvd	73.08	41.06	82.0
Carbon Monoxide Concentration	CO	ppmvd	9.48	3.69	270
Formaldehyde Concentration	HCOH	ppmvd	3.70	-	
Oxygen Concentration	O_2	$\%_{dry}$	10.59	-	-
VOC (as propane) Concentration	C3H8	ppmvd	2.40	1.78	60
Nitrogen Oxides Emission Rate	NO_x	pph	1.85	-	-
Carbon Monoxide Emission Rate	CO	pph	0.15	-	-
Formaldehyde Emission Rate	HCOH	pph	**0.061**	-	**0.056**
Non-Methane Organic Compounds Emission Rate	NMOC	pph	0.06	-	-
Nitrogen Oxides Concentration	NO_x	g/HP-hr	0.44	-	0.55
Carbon Monoxide Concentration	CO	g/HP-hr	0.03	-	0.44
VOC (as propane) Concentration	C3H8	g/HP-hr	0.01	-	0.105

Table 2: EUCHP1 Flow Measurements

Grand Rapids Water Resources Recovery Facility

Facility: Grand Rapids Water Resources Recovery Facility
City: Grand Rapids, Michigan
Source: EUCHP1
Date: 9/12/2024

Parameter	Units	Average
Stack Gas Temperature	°F	716.5
Stack Gas Moisture	%	11.71
Velocity	ft/min	7432.8
Actual Flowrate	acfm	9,121
Dry Reference Flowrate	dscfm	3,547
Dry Reference Flowrate	m^3/s	1.90

*The referenced flowrate for EUCHP1 was not taken on site due to the unit being inoperable and the 2023 flowrate was used to determine emissions

Table 3: Summary of Emissions - EUCHP3

Grand Rapids Water Resources Recovery Facility

Facility: Grand Rapids Water Renewal
City: Grand Rapids, MI
Source: EUCHP3
Date: 9/12/2024

	Symbol	Units	Test 1	Test 2	Test 3	Average	Corrected to 15% O_2	Limits
Nitrogen Oxides Concentration	NO_x	ppmvd	77.33	76.45	76.10	76.63	44.37	82.0
Carbon Monoxide Concentration	CO	ppmvd	5.03	5.23	5.22	5.16	2.99	270
Formaldehyde Concentration	HCOH	ppmvd	2.59	2.52	2.60	2.57	-	
Oxygen Concentration	O_2	$\%_{dry}$	10.71	10.64	10.78	10.71	-	-
VOC (as propane) Concentration	HCOH	ppmvd	0.74	0.71	0.95	0.80	0.46	60
Nitrogen Oxides Emission Rate	NO_x	pph	2.27	2.15	2.20	2.21	-	-
Carbon Monoxide Emission Rate	CO	pph	0.09	0.09	0.09	0.09	-	-
Formaldehyde Emission Rate	HCOH	pph	0.050	0.046	0.049	0.048	-	0.056
Non-Methane Organic Compounds Emission Rate	NMOC	pph	0.02	0.02	0.03	0.02	-	-
Nitrogen Oxides Concentration	NO_x	g/HP-hr	0.5378	0.5100	0.5221	0.5233	-	0.55
Carbon Monoxide Concentration	CO	g/HP-hr	0.02	0.02	0.02	0.02	-	0.44
VOC (as propane) Concentration	C3H8	g/HP-hr	0.005	0.005	0.006	0.005	-	0.105

Table 4: EUCHP3 Flow Measurements

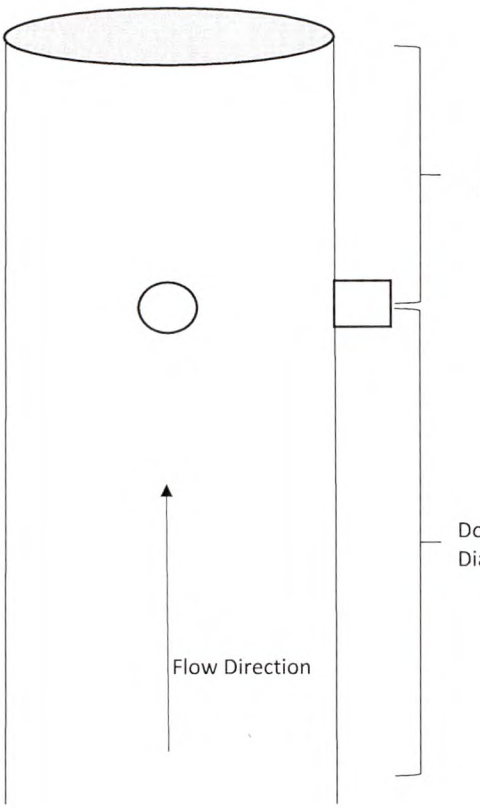
Grand Rapids Water Resources Recovery Facility

Facility: Grand Rapids Water Resources Recovery Facility
City: Grand Rapids, Michigan
Source: EUCHP3

Parameter	Units	Test 1	Test 2	Test 3	Average
Stack Gas Temperature	°F	751.6	725.8	737.1	738.1
Stack Gas Moisture	%	10.86	10.79	10.60	10.75
Velocity	ft/min	8698.7	8155.7	8457.0	8437.1
Actual Flowrate	acfm	10,675	10,009	10,378	10,354
Dry Reference Flowrate	dscfm	4,108	3,939	4,055	4,034
Dry Reference Flowrate	m^3/s	1.94	1.86	1.91	1.90

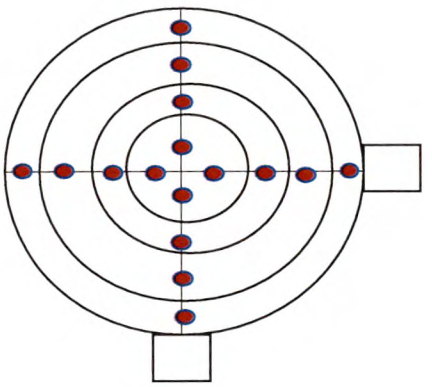
FIGURES

Figure No. 1: Schematic of EUCHP1 & EUCHP3



Diameter: 15 inches

Sampling Points (in.)	
1	0.50
2	1.58
3	2.91
4	4.85
5	10.16
6	12.09
7	13.43
8	14.50



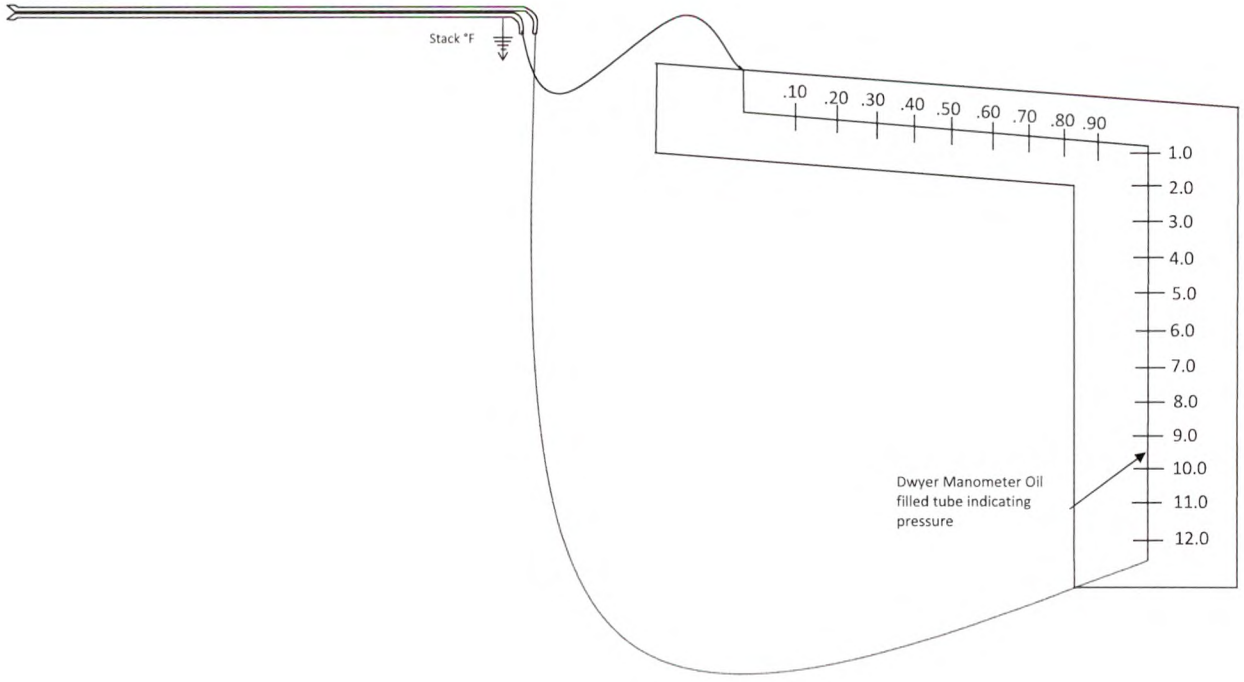
Not to scale

EUCHP1 & EUCHP3
City of Grand Rapids
Grand Rapids Water Resource Recovery
Grand Rapids, MI

Date:
21-Sep-24

RWDI USA LLC
24445 Forterra Dr
Warren, MI 48089

Figure No. 2: USEPA Method 2 Schematic



USEPA Method 2

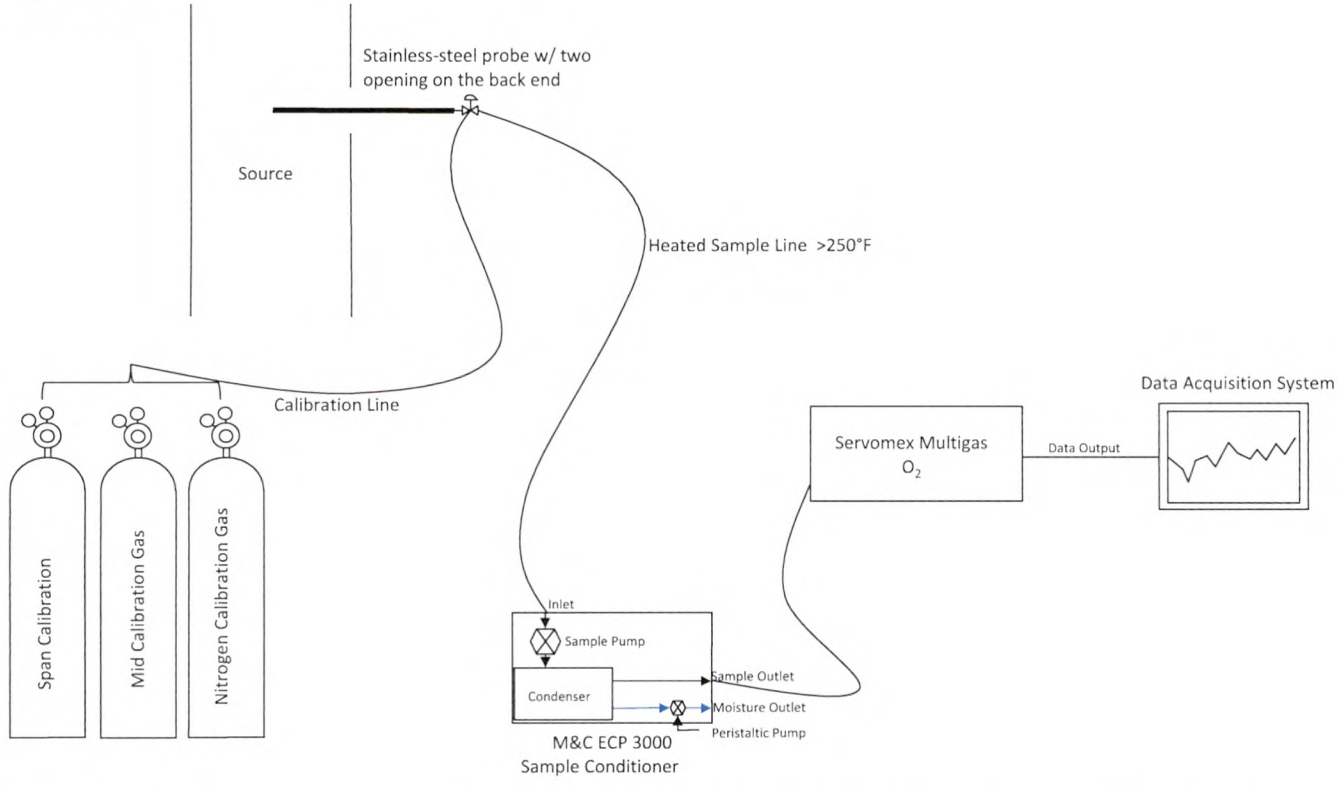
Grand Rapids Water Resource Recovery

EUCHP1 & EUCHP3
Grand Rapids, MI

Project #2407736

Date: September 12, 2024

Figure No. 3: USEPA Method 3A Schematic



USEPA Method 3A

Grand Rapids Water Resource Recovery

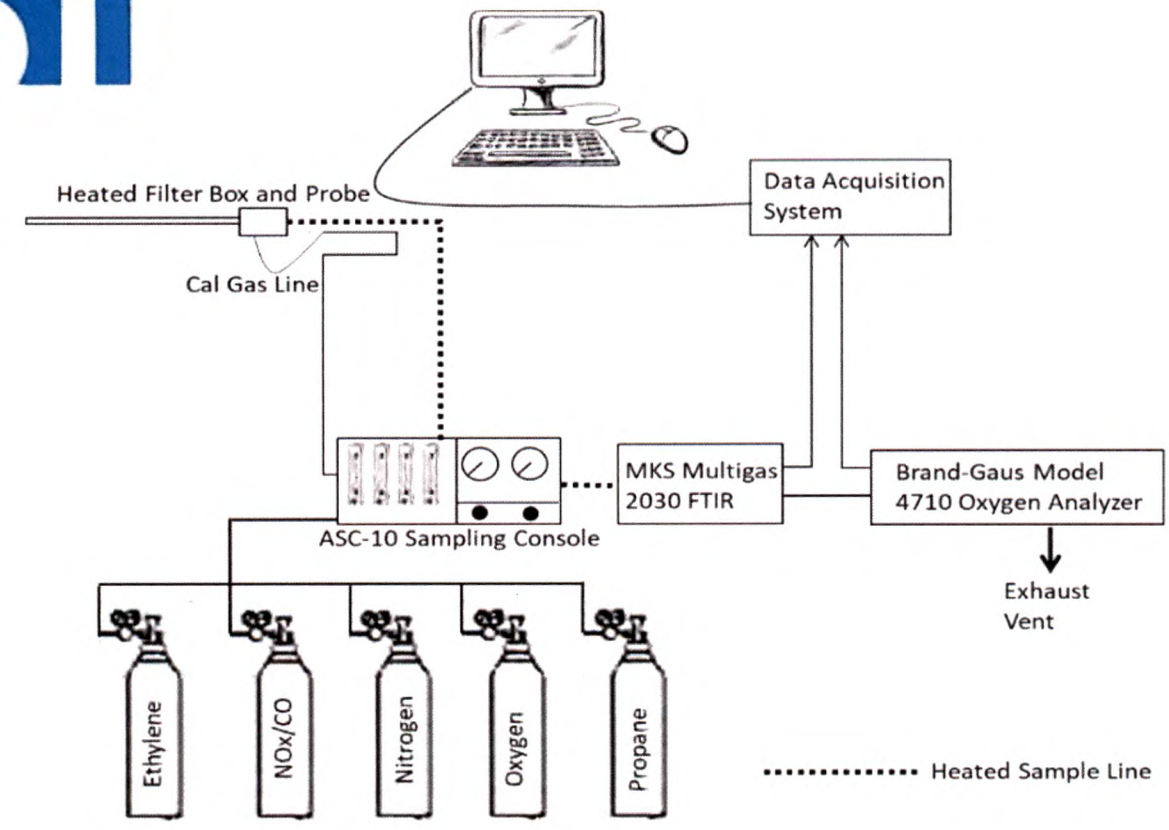
EUCHP1 & EUCHP3

Grand Rapids, MI

Project# 2407736

Date: September 12, 2024

Figure No. 4: USEPA Method 320 Schematic



USEPA Method 3A/320

Grand Rapids Water Resource Recovery

EUCHP1 & EUCHP3

Grand Rapids, MI

Project# 2407736

Date: September 12, 2024