



COMPLIANCE TEST REPORT

for

QUARTERLY HYDROGEN CHLORIDE (HCL) EMISSIONS

EU-BOILER2-SC (Unit 2)

(SRN: B2796)

4th Quarter 2020

**St. Clair Power Plant
East China, Michigan**

October 28, 2020

**Prepared By:
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1.0 INTRODUCTION

DTE Energy's Environmental Management and Safety (EM&S) Field Services Group performed 2nd Quarter 2020 Hydrogen Chloride (HCl) emissions testing on the exhaust of EU-BOILER2-SC at the St. Clair Power Plant, located in East China, Michigan. The testing was required by the 40 CFR Part 63, Subpart UUUUU (Mercury and Air Toxics Standards - MATS) to document quarterly HCl stack emissions. The testing was conducted on October 28, 2020.

Testing was performed pursuant to ASTM Method D6348.

The fieldwork was performed in accordance with EPA Reference Methods and DTE Energy Intent to Test¹, which was approved in a letter by Mr. Tom Gasloli from the Michigan Department of Environment, Great Lakes, and Energy (EGLE), dated January 13, 2017². The following DTE Energy personnel participated in the testing program: Mr. Thomas Snyder, Senior Environmental Specialist, and Mr. Fred Meinecke, Senior Engineering Technician. Mr. Snyder was the project leader. Mr. Dominic Vendittelli, Associate Environmental Engineer at the plant provided process coordination for the testing program.

2.0 SOURCE DESCRIPTION

The St Clair Power Plant (SCPP) located at 4901 Pointe Drive in East China, Michigan, employs the use of four (4) coal-fired boilers (Units 2-3, 6, and 7). Units 2-3 each have Babcock and Wilcox boilers capable of producing 1,070,000 pounds per hour of steam. Units 2 and 3 are equipped with Allis Chalmers turbine generators each with a nominally rated capability of 170 megawatts (MW). Full load capability for Units 2-3, while firing coal only, are 135 MW and, 150 MW while over-firing with oil.

Units 6 and 7 have Combustion Engineering boilers capable of producing 2,100,000 and 3,580,000 pounds of steam per hour respectively. The turbine generators on each unit were manufactured by Westinghouse and have a nominally rated capability of 325 and 500 megawatts respectively. Full load capability for Units 6 and 7 while firing coal only is approximately 315 MW and 470 MW respectively.

The air pollution control equipment on Units 2-3 consists of Wheelabrator Frye electrostatic precipitators on each unit that have design collection efficiencies of 99.6%. Each exhaust stack is 599 feet tall with an internal diameter of 13.3 feet. The air pollution control equipment on Unit 6 consists of Research Corporation electrostatic

¹ EGLE, Test Plan, Submitted January 5, 2017. (Attached-Appendix A)

² EGLE, Approval Letter, dated January 13, 2017. (Attached-Appendix A)



precipitators that have design collection efficiencies of 99.6%. The exhaust stack is 425 feet tall with an internal diameter of 19.0 feet. The air pollution control equipment on Unit 7 consists of an American Standard electrostatic precipitator that has design collection efficiency of 99.6%. The exhaust stack is 600 feet tall with an internal diameter of 16.0 feet

Each boiler is equipped with a Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI) air quality control system. The DSI system is used to control acid gas, PM, PM10, PM2.5, and NOx emissions from each unit. Trona is received at the plant where inline mills further refine the Trona. The ACI system is used to control Mercury emissions from each unit.

Testing was performed on EU-BOILER2-SC while operating at maximum normal operating load and representative of site specific normal operating conditions per 40 CFR part 63.10007.

3.0 SAMPLING AND ANALYTICAL PROCEDURES

DTE Energy obtained emissions measurements in accordance with procedures specified in the USEPA *Standards of Performance for New Stationary Sources* or listed as an approved "Other Test Method". The sampling and analytical methods used in the testing program are indicated in the table below:

Sampling Method	Parameter	Analysis
ASTM Method D6348	HCl, CO ₂ , and, Moisture Content	FTIR
USEPA Method 19	Emission Rate Calculations	Stoichiometric Calculations

3.1 MOISTURE (ASTM D6348)

3.1.1 Sampling Method

Moisture content in the exhaust was evaluated using ASTM D6348, "Measurement of Vapor Phase Organic Emissions by Extractive Fourier Transform Infrared (FTIR)".

3.2 CARBON DIOXIDE (ASTM D6348)

3.2.1 Sampling Method

Carbon dioxide (CO₂) emissions were evaluated using ASTM D6348, "Measurement of Vapor Phase Organic Emissions by Extractive Fourier Transform Infrared (FTIR)".

pressure and temperature corrections are then applied to compute the final sample concentration. The manually calculated results are then compared with the software-generated results. The data is then validated if the two concentrations are within $\pm 5\%$ agreement. If there is a difference greater than $\pm 5\%$, the spectra are reviewed for possible spectral interferences or any other possible causes that might lead to inaccurately quantified data. PRISM Analytical Technologies, Inc. validated the FTIR data. The data validation reports are located in Appendix B.

3.3.4 Data Reduction

Each spectrum was derived from the coaddition of 64 scans, with a new data point generated approximately every one minute. The emissions were recorded in parts per million (ppm) wet volume basis. The CO₂ emissions were recorded in percent (%) wet volume basis. The moisture content was recorded in percent (%).

4.0 OPERATING PARAMETERS

The test program included the collection of boiler load and stack emissions CEMs data during each test run. Parameters recorded included gross Megawatts (GMW) and CEMs data (SO₂, NO_x, CO₂, and opacity). Additionally, dry sorbent injection rates (DSI) and activated carbon injection rates (ACI), in pounds per hour (lb/hr), are reported. Operational Data collected during the testing is presented in Appendix C.

During each day of emissions sampling, a representative coal sample was collected from the unit and analyzed for ultimate and proximate analysis, including % Sulfur, % Ash, and heat content. The results of the coal analysis was used to calculate an Fc value for each day of testing and used in the lb/MMBtu calculations. Results of the fuel analysis can be referred to in Appendix E. HCl emissions testing was performed at maximum normal operating load and representative of site specific normal operating conditions per 40 CFR part 63.10007.

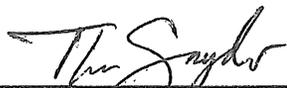
5.0 DISCUSSION OF RESULTS

Table 1 presents the HCl emission testing results from EU-BOILER2-SC. HCl emissions are presented in parts per million on a wet basis (ppm_w) and pounds per million BTU (lbs/MMBtu). The EU-BOILER2-SC HCl emissions during the testing averaged 0.27ppm. EU-BOILER2-SC demonstrated average HCl emissions below the Subpart UUUUU limit of 0.002 lb/MMBtu.

The auxiliary test data presented in the results table for each test includes the unit load in gross megawatts (GMW), DSI injection rate (lb/hr), ACI injection rate (lb/hr), and CO₂ concentration (%_{wet}).

6.0 CERTIFICATION STATEMENT

"I certify that I believe the information provided in this document is true, accurate, and complete. Results of testing are based on the good faith application of sound professional judgment, using techniques, factors, or standards approved by the Local, State, or Federal Governing body, or generally accepted in the trade."



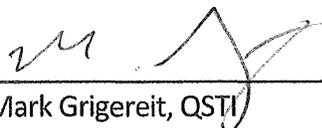
Mr. Thomas Snyder, QSTI

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RESULTS TABLES



TABLE NO. 1
HYDROGEN CHLORIDE EMISSIONS TESTING RESULTS
St. Clair Power Plant - EU-BOILER2-SC (Unit 2)
October 28, 2020

Test	Test Date	Test Time	Unit Load (GMW)	DSI Injection Rate (lb/hr)	ACI Injection Rate (lb/hr)	CO ₂ Concentration (% _{wet,corrected})	HCl Concentration (ppmv _{wet})	HCl Emissions (lbs/MMBtu) ⁽¹⁾⁽²⁾
HCl-1	28-Oct-20	8:27-9:27	124	0	76	7.9	0.30	0.0006
HCl-2		9:47-10:47	125	0	48	8.0	0.28	0.0005
HCl-3		11:00-12:00	<u>125</u>	<u>0</u>	<u>31</u>	<u>7.9</u>	<u>0.23</u>	<u>0.0004</u>
<i>Average:</i>			125	0	52	7.9	0.27	0.0005

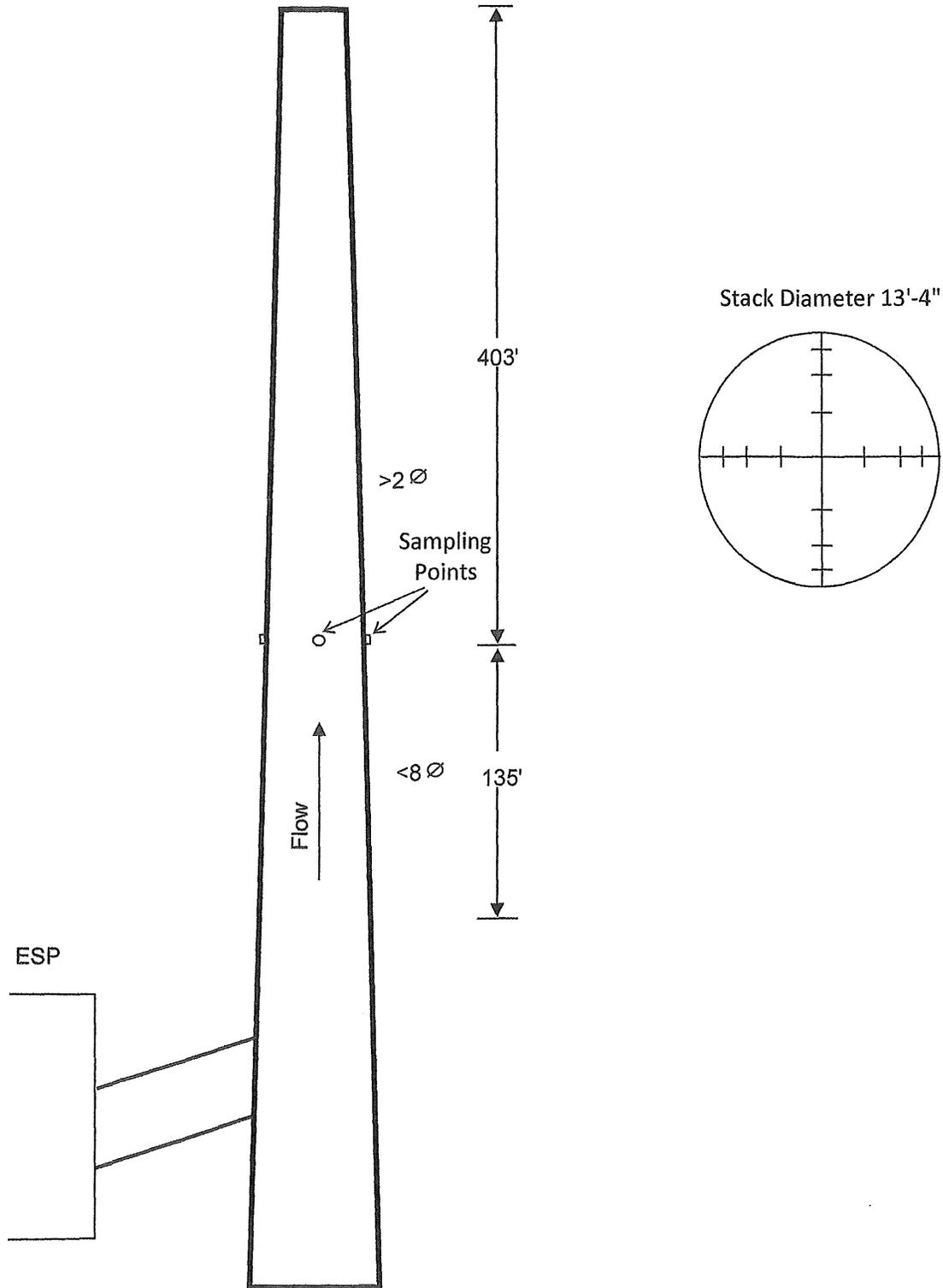
(1) Corrected to (%R)

(2) MATS Limit = 0.002 lb/MMBtu

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FIGURES

Figure 1 – Sampling Location
St. Clair Power Plant – EU-BOILER2-SC
October 28, 2020



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Figure 2 – ASTM D6348
St. Clair Power Plant – EU-BOILER2-SC
October 28, 2020

