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**EUBIOGASFLARE**  
**Emissions Test Report**

*Prepared for:*

**Packaging Corporation of America**

Packaging Corporation of America  
2246 Udell Street  
Filer City, Michigan 49634

Project No. 17-4999.01  
August 14, 2017

BT Environmental Consulting, Inc.  
4949 Fernlee Avenue  
Royal Oak, Michigan 48073  
(248) 548-8070



### Executive Summary

BT Environmental Consulting, Inc. (BTEC) was retained by Packaging Corporation of America (PCA) to perform testing for heat content and hydrogen sulfide (H<sub>2</sub>S), of the scrubber biogas routed to the EUBIOGASFLARE (biogas flare). The biogas flare is located at the PCA facility in Filer City, Michigan. Testing was conducted on June 22, 2017.

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## 1.0 Introduction

BT Environmental Consulting, Inc. (BTEC) was retained by Packaging Corporation of America (PCA) to perform testing for heat content and hydrogen sulfide (H<sub>2</sub>S), of the biogas routed to the EUBIOGASFLARE (biogas flare). The biogas flare is located at the PCA facility in Filer City, Michigan.

### 1.1 Purpose of Test

Testing was done to demonstrate compliance with MDEQ permit number is MI-ROP-B3692-2015b, special conditions V.2 and VI.1 of FGBIOGASSYSTEM. The H<sub>2</sub>S limit is 4.49 lb/hr before combustion in a boiler or flare. The SO<sub>2</sub> limit is 8.45 lb/hr exiting the boiler or flare and is calculated by assuming complete combustion of H<sub>2</sub>S to SO<sub>2</sub>. PCA is required by permit to document the BTU's in the biogas fuel on an annual basis.

### 1.2 Test Date

This test program was performed on June 22, 2017.

### 1.3 Project Contact Information

Affiliation	Address	Contact
Test Facility	Packaging Corporation of America 2246 Udell Street Flier City, Michigan 49634	Ms. Sara Kaltunas 231-510-4689 skaltunas@packagingcorp.com
Test Company Representative	BT Environmental Consulting, Inc. 4949 Fernlee Avenue Royal Oak, Michigan 48073	Mr. Barry Boulianne 313-449-2361 bboulianne@btecinc.com

This test program was performed by Todd Wessel and Mason Sakshaug of BTEC. Ms. Sara Kaltunas of PCA coordinated the test events for this project.

### 1.4 Summary of Results

A summary of H<sub>2</sub>S results is presented in Table 1. Detailed results can be found appended to this report.

**Table 1**  
**Summary of EUBIOGASFLARE Emission Rates**

Sampling Location	Target Analyte	Emission Rate (lb/hr)	Permit Limit (lb/hr)
SVBIOGASFLARE	post combustion H <sub>2</sub> S	0.003	0.0449
	pre combustion H <sub>2</sub> S	0.309	4.49
	SO <sub>2</sub>	0.581	8.45



The average higher heating value (HHV) of the biogas was measured to be 724 British thermal units per dry standard cubic foot (Btu/dscf). Detailed results are contained in Appendix B.

## **2.0 Process Description**

PCA operates the biogas flare as part of the FG BIOGASSYSTEM that is used to combust biogas during upset or malfunction conditions that may occur with the biogas generating system or the combustion boilers. If no upset conditions occur in the process, the biogas is directed to Boiler No. 4 (EU BOILER4A) and combined with natural gas to generate steam for various mill process operations, and for electrical generation.

## **3.0 Reference Methodologies**

Triplicate fifty (50)-minute test runs were performed on the biogas prior to the scrubber in accordance with specifications stipulated in ASTM D-5504 and in accordance with MDEQ requirements.

A minimum vacuum of 5 inches of mercury is required on the evacuated summa canister to ensure proper sample collection. All test runs were stopped once the minimum vacuum was attained.

### **3.1 Hydrogen sulfide**

Hydrogen Sulfide concentrations were determined following ASTM guidelines as described in ASTM D-5504. The samples were extracted using evacuated summa canisters with low flow regulators. The sample stream was vented and aspirated to the summa canister for collection. Samples were labeled and immediately shipped for analysis within the required 24-hour period.

## **4.0 Quality Assurance**

Each promulgated method described above is accompanied by a statement indicating that to obtain reliable results, persons using these methods should have a thorough knowledge of the techniques associated with each. To that end, BTEC attempts to minimize any factors in the field that could increase error by implementing a quality assurance program into every testing activity segment.

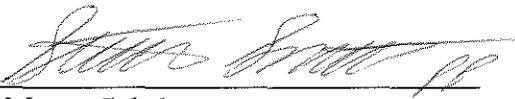
## **5.0 Discussion of Results**

The flow rate was measured at approximately 0 dcfm for the first 19 minutes of Run 2 due to a loss of wastewater influent feed during a paper machine break. Wastewater influent to the biogas facility is made up primarily of process dilution water for the mill's paper machines so if there is any paper machine equipment downtime, planned or unplanned, wastewater flow to the biogas facility is reduced during that time. Sampling for Run 2 was paused at 9:41am and resumed at 12:15 pm when the flow rate increased. The measured average biogas flare H<sub>2</sub>S emission rates are less than MDEQ permit Number MI-ROP-B3692-2016b requirements.



**Limitations**

The information and opinions rendered in this report are exclusively for use by PCA. BTEC will not distribute or publish this report without PCA's consent except as required by law or court order. BTEC accepts responsibility for the competent performance of its duties in executing the assignment and preparing reports in accordance with the normal standards of the profession, but disclaims any responsibility for consequential damages.

This report was prepared by:   
Mason Sakshaug  
Environmental Technician

This report was reviewed by:   
Brandon V. Chase  
Senior Environmental Engineer

Table 2  
EUBIOGASFLARE H2S and SO2 Concentrations and Emission Rates

	Start	End
Test 1	6/22/2017 8:26	6/22/2017 9:16
Test 2a	6/22/2017 9:22	6/22/2017 9:42
Test 2b	6/22/2017 12:15	6/22/2017 12:45
Test 3	6/22/2017 12:47	6/22/2017 13:37

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**RESULTS**

Test	H2S Conc.		Average Flow (60°F & 1 atm)		Standard flow (70°F & 1 atm)		Mass Flow (total)		Emitted <sup>1</sup>		Emitted <sup>2</sup>	
	Value	Unit	Value	Unit	Value	Unit	Value	Unit	Value	Unit	Value	Unit
Test 1	554	ppm	22.93	dcfm	23.367	dscfm	0.068	Lb/hr H2S	0.001	Lb/hr H2S	0.129	Lb/hr SO2
Test 2	892	ppm	17.36	dcfm	17.697	dscfm	0.083	Lb/hr H2S	0.001	Lb/hr H2S	0.157	Lb/hr SO2
Test 3	1899	ppm	75.85	dcfm	77.305	dscfm	0.775	Lb/hr H2S	0.008	Lb/hr H2S	1.459	Lb/hr SO2
<b>Average</b>							<b>0.309</b>	<b>Lb/hr H2S</b>	<b>0.003</b>	<b>Lb/hr H2S</b>	<b>0.581</b>	<b>Lb/hr SO2</b>

<sup>1</sup> Calculated by assuming 99% destruction of H2S during combustion

<sup>2</sup> Calculated by assuming complete combustion of H2S to SO2

**CALCULATIONS:**

Converting PPMvd to Lbs/Hr:

$$\frac{\text{lb - mole pollutant}}{\text{MM lb - mole air}} \times \frac{\text{lb pollutant}}{\text{lb - mole pollutant}} \times \frac{\text{lb - mole air}}{386.5 \text{ ft}^3 \text{ air}} \times \frac{\text{ft}^3 \text{ air}}{\text{min}} \times \frac{60 \text{ min}}{\text{hr}} = \text{lb/hr}$$

$$\frac{1899 \text{ lb - mole H2S}}{\text{MM lb - mole biogas}} \times \frac{34 \text{ lbs H2S}}{1 \text{ lb - mol H2S}} \times \frac{1 \text{ lb - mole biogas}}{386.5 \text{ ft}^3 \text{ biogas}} \times \frac{77.305 \text{ ft}^3 \text{ biogas}}{\text{min}} \times \frac{60 \text{ min}}{\text{hr}} = 0.775 \frac{\text{lb}}{\text{hr}} \text{ H2S}$$

Converting flow to DSCFM (70°F & 1 atm) from DCFM (60°F & 1 atm):

$$Q_{scfm} = Q_{acfm} \times \frac{460 + 70^\circ F}{460 + T_o} \times \frac{P_o}{P_s}$$

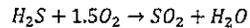
$$78.392_{scfm} = 76.91_{acfm} \times \frac{460 + 70^\circ F}{460 + 60^\circ F} \times \frac{1 \text{ atm}}{1 \text{ atm}}$$

Where:

P<sub>o</sub> = Pressure at multivariable flow meter (1 atm)

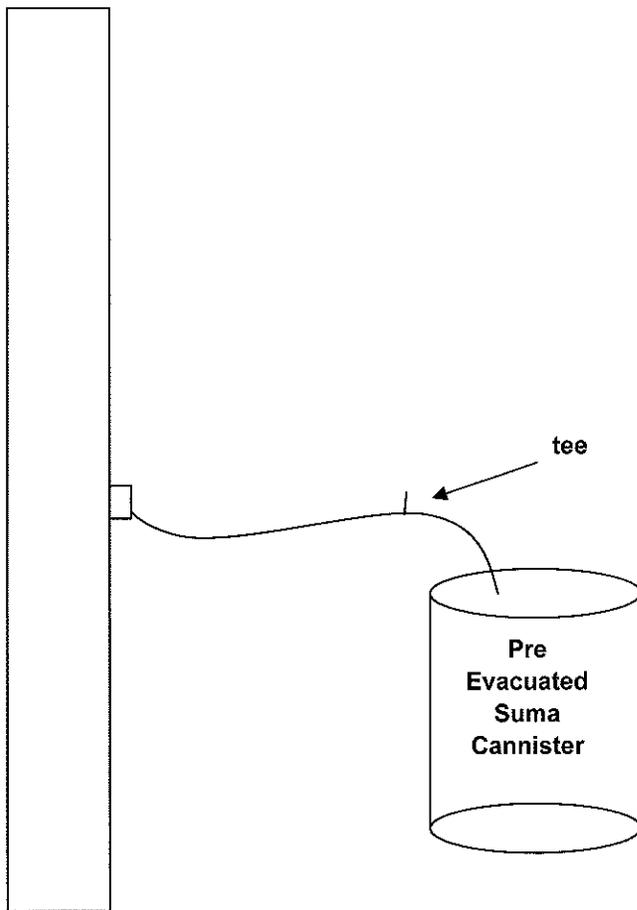
T<sub>o</sub> = Temperature at multivariable flow meter (60°F)

Converting H2S lbs/hr to SO2 lbs/hr:



$$\frac{\text{lb H2S}}{\text{hr}} \times \frac{1 \text{ lb - mole H2S}}{34 \text{ lbs H2S}} \times \frac{1 \text{ lb - mole SO2}}{1 \text{ lb - mole H2S}} \times \frac{64 \text{ lbs SO2}}{1 \text{ lb - mole SO2}} = \frac{\text{lb}}{\text{hr}} \text{SO2}$$

$$\frac{1.544 \text{ lb H2S}}{\text{hr}} \times \frac{1 \text{ lb - mole H2S}}{34 \text{ lbs H2S}} \times \frac{1 \text{ lb - mole SO2}}{1 \text{ lb - mole H2S}} \times \frac{64 \text{ lbs SO2}}{1 \text{ lb - mole SO2}} = 2.907 \frac{\text{lb}}{\text{hr}} \text{SO2}$$



**Figure No. 1**

Site:  
Sampling Schematic  
Packaging Corporation of America  
Filer City, Michigan

Sampling Date:  
June 22, 2017

BT Environmental Consulting, Inc.  
4949 Fernlee Avenue  
Royal Oak, Michigan